DRAFT

TANK REMOVAL WORK PLAN
TONAWANDA COKE CORPOATION
SITE 108
3800 RIVER ROAD
TONAWANDA, NEW YORK

Prepared For:

Honeywell

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PARSONS

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April 2019

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LIST OF ACRONYMS

ft.	foot/feet
SVOC	semivolatile organic compounds
TCC	Tonawanda Coke Corporation
USEPA	United States Environmental Protection Agency
VOC	volatile organic compounds

1.0 INTRODUCTION

This work plan presents proposed activities to remove three aboveground storage tanks and their remaining contents (tar and water) at Site 108 of the Tonawanda Coke Corporation (TCC) property in Tonawanda, NY. Planned activities include construction preparation, the removal of the tar and water, removal of the tanks, and site restoration upon completion of the work, as detailed below.

Procedures have also been developed to protect the health and safety of on-site personnel and ensure that further contamination will not occur as a result of this project (Site Health and Safety Plan, Appendix A). Following contractor selection and finalization of implementation means and methods, the contractor Health and Safety Plan will also be provided to the United States Environmental Protection Agency (USEPA).

2.0 BACKGROUND

The subject property is part of the TCC plant. The main plant is located at 3875 River Road in Tonawanda, NY. Site 108 is located across the street at 3800 River Road (Figure 1). Site 108 extends from River Road to the Niagara River. Site access is restricted with a lock gate on the property boundary along River Road. There is a perimeter containment berm around the three tanks (Figure 2).

Background information indicates the site was primarily used for main plant shipping and deliveries by way of the Niagara River, including coke, coal, and coal tar (GHD 2017). Although no definitive information was identified, it is believed the three tanks were used for coal tar storage.

Several rounds of investigation have been conducted at the site. Key findings relative to the storage tanks are as follows (GHD 2017):

- Storage Tanks – Each of the three tanks is about 45 feet (ft,) in diameter and has a concrete base.
  - Tank 1
    - Partially demolished; cut down to about 10 ft. in height
    - 4 to 5 ft. of product material was noted inside
  - Tank 2
    - About 36 ft. in height
    - A large hole, about 12-ft. by 12-ft., exists in the top of the tank
    - About 9 ft. of product was noted in the tank
    - About 3.5 ft. of water is present on top of the tar
    - One small hole was noted on the north side of the tank
  - Tank 3
    - About 36 ft. in height
    - Several weep holes were noted in the tank walls
    - About 2 ft. of product was noted in the tank
  - Samples of tar from each tank show elevated levels of semivolatile organic compounds (SVOCs), including naphthalene, benzo compounds, pyrene, fluoranthene, and chrysene, all of which are consistent with a coal tar product (GHD 2017).

Observations during a site visit by Parsons on November 12, 2018 indicated that recent remedial construction activities had occurred, most notably:

- Several holes had been created in the side walls of Tank 3 approximately 5 ft. from the bottom of the tank.
- A portion of the berm adjacent to the north side of Tank 2 had been mechanically breached and partially repaired.
- Portions of the berm adjacent to Tanks 1 and 2 had been disturbed. Disturbed areas southwest of the berm appeared to be berm material relocated as part of the prior site activities.
- Pipes which appear to have been cut from Tank 2 and poly sheeting were laying inside the containment area on the north side of Tank 2. A black material was noted to be floating on the surface of the water on the north side of Tank 2 as well. A pipe connecting to a damaged valve on the north side of Tank 2 has been cut and a drop of black material on the lip of the pipe evidenced it may have released material into the water below.

To address potential short-term concerns raised by USEPA based on site conditions, Honeywell implemented interim measures per a USEPA-approved workplan (Parsons 2018) which included repairs to the perimeter berms, covering of two onsite soil piles, and related activities. Repair of the berms was completed in February 2019. In addition, site conditions and water levels within the berms are now monitored monthly and after significant precipitation events. If water levels within the secondary containment comes within two feet of the top of the berm at any location, water will be removed and managed as discussed in Section 4.3

3.0 TANK REMOVAL AND ASSOCIATED ACTIVITIES

This section details the activities associated with the removal of tar and water from the tanks and the subsequent demolition of the tanks. Work on the project will be completed by a qualified contractor. Specific activities to be completed include:

- Site Control
- Mobilization
- Site preparation
- Temporary soil erosion and stormwater controls
- Air monitoring
- Piping and ancillary equipment removal within the bermed areas
- Tar and water removal and tank demolition

Each of these activities are discussed below.

3.1 SITE CONTROL

Prior to mobilization, the project area will be made secure from access by unauthorized personnel. This will be accomplished through the use of appropriate barriers (barrier tape, concrete barriers, fencing, cones, rope, etc.). Only authorized vehicles and personnel will be allowed into the project area. During work periods, all employees and visitors will be required to sign in and out of the site.

3.2 MOBILIZATION

Equipment and materials involved in the removal of tar and water, tank cleaning and tank removal activities will be mobilized and staged in the vicinity of the project area. Additionally, a decontamination area, storage area, office trailer, and sanitary facilities will be staged nearby to be used during the removal activities.

The decontamination area will be used for the removal of residual contaminated material from equipment and materials prior to leaving the project area. The area will be equipped with a pressure washer or similar appropriate equipment. It will also contain storage for the collection of wash water used in the decontamination process. The floor will consist of an impervious lined layer to provide appropriate secondary containment of any contaminated material or wash water.

3.3 SITE PREPARATION

Competent secondary containment berms are present around the tanks. These berms will be preserved to the extent practical until removal of the tank contents is complete. If partial deconstruction of the berms is required to allow access to the tanks before removal of the tank contents is completed, the plan and any contingency measures required will be presented to USEPA for approval prior to implementation.

Any existing water within the berms will be removed prior to construction. Water management will be conducted as detailed in Section 4.3.

3.4 TEMPORARY SOIL EROSION AND STORMWATER CONTROLS

Prior to the start of the tank removal activities, temporary erosion control and stormwater management structures will be installed throughout the project area as necessary to control surface water, minimize the potential for erosion, and limit the migration of tank contents and other residual tar during project activities. Stormwater and erosion controls may include the following, as necessary:

- Silt fence and hay bales
- Temporary check dams and diversion ditches/structures/equipment to divert surface water flow around the project area
- Sedimentation control structures around the decontamination and material storage areas

Inspection of these controls will be performed as a part of the site maintenance activities and required corrections will be made in a timely manner.

3.5 AIR MONITORING

Air monitoring will be conducted during project as necessary to ensure that work does not expose on-site personnel to potentially harmful contaminants. Controls will be put in place to limit exposure to dust and emissions. Personal air monitoring will be conducted as necessary.

3.6 PIPING AND ANCILLARY EQUIPMENT REMOVAL

Prior to removal of the tanks, piping and ancillary equipment associated with the tanks will be disconnected and removed to the extent necessary to facilitate tank removal. The pipe insulation was sampled on February 28, 2019 and found to contain asbestos. Asbestos removal procedures such as glove bags will be used to remove the asbestos insulation from the pipes or the pipes will be cut in sections with the insulation intact. Pipe and equipment removal will be done using a combination of cutting and mechanical shearing. Contaminated piping and ancillary equipment will be wrapped in 6 mil poly and transported to the decontamination area for cleaning , as necessary. All non-contaminated piping and ancillary equipment removed will also be taken to the decontamination facility before transport off-site for disposal or salvage. Remaining piping will be inspected and the ends blind flanged if tar is present in the pipes.

3.7 TAR AND WATER REMOVAL AND TANK DEMOLITION

Based on preliminary evaluations, it is anticipated the tar will be stabilized *in situ* prior to removal from the tanks through the use of a stabilization agent such as wood chips/saw dust, lime kiln dust, cement kiln dust, or other applicable substances. This assumption forms the basis for the removal plan detailed below. If subsequent evaluations, including review of tank content testing results (anticipated mid-May) and subsequent discussions with disposal and recycling facilities, determine an alternative removal approach, such as heating and pumping, is more appropriate, details will be provided to USEPA for approval prior to implementation.

Removal will begin with the demolition and removal of the top portion of the tanks. To decrease the hazards associated with the tar remaining in the tanks, the demolition will utilize cold cut and mechanical shear procedures. The tanks will be demolished from the top down to about two to three feet above the current tar levels. The remaining bottom portion of the tanks will be left in place and utilized as a mixing basin to stabilize the tar .

Prior to stabilization, water remaining in the tanks will be removed and managed in accordance with Section 4.3. The stabilization agent will then be added in an adequate quantity to ensure that the mixed material passes the paint filter test before removal from the site. Load-out and off-site disposal of the stabilized tar will begin following stabilization of tar from the first tank. After completion of stabilized tar removal from the tanks, the bottom portion of the tank walls will be demolished.

Scrap metal from demolition be further downsized and processed for off-site recycling or disposal in accordance with Section 4.2.

4.0 MATERIAL MANAGEMENT

This section details the activities surrounding the management of materials generated during the removal of the tanks. Any material generated will be managed with the intent of compliance with all applicable regulations and limiting environmental impacts. Applicable hazardous and non-hazardous waste manifests will accompany all materials from the site to their final destination. A detailed description of the management of site materials is provided below, including:

- Tar
- Metal
- Water

4.1 TAR REUSE/DISPOSAL

Prior to offsite reuse or disposal, the tar in the tanks will be undergo laboratory analysis to determine the most appropriate management approach. Samples of the remaining tar in the tanks were collected on April 11, 2019. The results of this testing and the proposed material management and reuse/disposal approach will be provided to USEPA for approval prior to mobilization to the site.

4.2 METAL

The tanks will be cut into manageable sized pieces and moved to the decontamination area. If the metal can be successfully decontaminated, it will be collected in the staging area post-decontamination in preparation for off-site removal to a salvage facility. If it determined that decontamination is not practical, the metal materials will be managed for disposal at an appropriate disposal facility.

4.3 WATER

As discussed in Section 1, site conditions and water levels within the berms are monitored monthly and after significant precipitation events. If water levels within the secondary containment comes within two feet of the top of the berm at any location, water removal will be implemented. As specified in the Interim Measures Work Plan, pending analytical results, review and approval by the Town of Tonawanda wastewater treatment plant and approval from the USEPA for discharge to the Town of Tonawanda sanitary system if water removal from within the berms is required, it will be discharged either directly to a nearby sanitary manhole along River Road or trucked to a nearby discharge point. In anticipation of the need for water removal, Honeywell has sampled water from within the berms and based on those results and discussions with the Town of Tonawanda, it is anticipated that discharge of this water to the sanitary sewer system will be acceptable.

Water is also present within the tanks. Samples of the water in the tanks were collected on April 11, 2019. The results of this testing and the proposed water management approach will be provided to USEPA for approval prior to mobilization to the site. This water is presumably contaminated due to being in direct contact with tar. Contaminated water will also be generated during tank and equipment decontamination. Contaminated water from these sources will be containerized as necessary and sampled for potential discharge to the sanitary sewers. If sampling indicates discharge to the sanitary sewers is not appropriate, it will be pretreated as necessary prior to discharge to the sanitary sewers or disposed of offsite. All sample results and the proposed management approach will be provided to USEPA for approval prior to implementation.

5.0 SITE RESTORATION AND REPAIRS

This section details the efforts that will be made to restore the areas of the site that were impacted by the work. A description of the elements of the site restoration plan is provided below, which includes:

- Material Staging and Decontamination Area
- Grading and Seeding
- Erosion and Stormwater Controls
- Demobilization

5.1 MATERIAL STAGING AND DECONTAMINATION AREA

Upon completion of work, the staging and decontamination areas will be visually inspected for the presence of tar. Any remaining tar resulting from tank demolition activities in these areas will be collected and staged for appropriate disposal.

5.2 GRADING AND SEEDING

Prior site activities identified the presence of tar within the bermed areas (GHD 2017). However, water present within the bermed areas has prevented verification of current conditions. Following the completion of tank removal work, the perimeter berms and area within the berms will be inspected to determine, in conjunction with USEPA, the appropriate approach for temporary site restoration. Options include leaving the berms intact and continuing water management within the bermed areas and breaching the berms with or without placement of a temporary cover over any surface tar.

Seeding will be done in disturbed areas as necessary to establish erosion control.

5.3 EROSION AND STORMWATER CONTROL

Following the completion of work, temporary stormwater and erosion controls will be removed, with disturbed areas receiving seeding and grading to prevent future erosion.

5.4 DEMOBILIZATION

At the conclusion of work, all personnel, equipment, supplies and materials will be demobilized from the site leaving it in an orderly condition. All temporary signage will also be removed. A final inspection will be conducted to confirm that demobilization has been completed in a satisfactory manner.

6.0 REPORTING

All site activities will be documented appropriately. This will include the following information on a daily basis during site activities:

- On-site personnel
- Date of work

- Photo documentation of material and on-site activities
- Quantities of materials transported off site
- Issues or concerns

Following completion of the project's activities, a summary report will be prepared which will include the following information:

- Certification by a licensed professional engineer. that the on-site activity was performed in accordance with the work plan
- A summary of the activities conducted at the site
- A summary of the management of all materials generated during the tank removal process

7.0 SCHEDULE

The anticipated construction schedule is as follows:

- Mobilization within 75 days of Work Plan approval.
- Completion of construction within 60 days of mobilization.
- Draft construction report to EPA within 60 days of construction completion.

8.0 REFERENCES

GHD. 2017. Confirmation Investigation Report for Site 108 – Tonawanda Coke Corporation. Prepared by GHD, Buffalo, New York. Revised March 17, 2017. https://www.dec.ny.gov/docs/remediation_hudson_pdf/tc2.pdf

Parsons. 2018. Interim Measures Work Plan Tonawanda Coke Corporation Site 108. Prepared by Parsons for Honeywell International. December 3, 2018.

FIGURES

FIGURE 1

Honeywell

TONAWANDA COKE COMPOUND
SITE 108 – 3800 RIVER RD
TONAWANDA, NEW YORK

SITE LOCATION MAP

PARSONS

301 PLAINFIELD ROAD, SUITE 350, SYRACUSE, NY 13212 * 315-451-9560

FILE NAME: P:\HONEYWELL\TONAWANDA COKE\10 TECHNICAL CATEGORIES\SK001.DWG
PLOT DATE: 11/13/2018 12:55 PM PLOTTED BY: RUSSO, JILL

POTENTIAL AREA AVAILABLE FOR LAYDOWN, STAGING, OR DECONTAMINATION

120 60 0 120 240

SCALE: 1"=120'

FIGURE 2

Honeywell

TONAWANDA COKE COMPOUND
SITE 108 – 3800 RIVER RD
TONAWANDA, NEW YORK

SITE OVERVIEW

PARSONS

301 PLAINFIELD ROAD, SUITE 350, SYRACUSE, NY 13212 * 315-451-9560

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APPENDIX A

PROJECT SAFETY, HEALTH AND ENVIRONMENTAL PLAN

TONAWANDA COKE SITE 108
PROJECT SAFETY, HEALTH, AND ENVIRONMENTAL PLAN
TONAWANDA, NEW YORK

Prepared For:

Honeywell

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REVIEWED AND APPROVED BY:

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Senior Safety Specialist:	Susan Gould	Date

APRIL 2019

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Program Safety Manager (PrSM)		**Contact No.**
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Client Project Management POC		**Contact Information**
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LIST OF ACRONYMS

AED	Automated External Defibrillator
AHA	Activity Hazard Analysis
BBO	Behavior Based Observation
CPR	Cardiopulmonary Resuscitation
CRZ	Contamination Reduction Zone
CSE	Contractor Safety Evaluation
EBS	Employee Based Safety
ERT	Emergency Response Team
ESHARP	Environment, Safety, Health and Risk Management Program
EZ	Exclusion Zone
ft.	Feet
GFCI	ground fault circuit interrupters
HAZWOPER	Hazardous Waste Operations and Emergency Response
IMA	Industrial Medical Associates
JSA	Job Safety Analysis
LHA	Labor Harmony Agreement
LOTO	Lockout/Tagout
MOC	Management of Change
MRO	Medical Review Officer
NYDOT	New York Department of Transportation
OM&M	Operation, Maintenance, and Monitoring
OSHA	Occupational Health and Safety Administration
PFD	Personal Flotation Device
PM	Project Manager
PPE	Personal Protective Equipment
PrM	Program Manager
PSHEP	Project Safety, Health, and Environmental Plan
PrSM	Program Safety Manager
RFP	Request for Proposal
SDS	Safety Data Sheets
SH&E	Safety, Health and Environment
SOW	Scope of Work
SSHEP	Subcontractor Safety, Health, and Environment Plan
SSO	Site Safety Officer
TCC	Tonawanda Coke Corporation
UV	Ultraviolet Radiation
USEPA	United States Environmental Protection Agency

SECTION 1

INTRODUCTION

This Project Safety, Health, and Environmental Plan (PSHEP) has been prepared for the Honeywell field operations at Tonawanda Coke Site 108 located at 3800 River Road, Tonawanda, New York. This PSHEP covers construction management for tank product removal and demolition of onsite aboveground tanks and is intended to be amended as needed to address subsequent site activities. Subcontractor construction activities will be covered by their own Subcontractor Safety, Health, and Environment Plan (SSHEP).

During field activities, Parsons' staff and its subcontractors may be exposed to hazards associated with the scope of work (SOW) activities. Employees will be required to use personal protective equipment (PPE) suitable for the task at hand. Upgrades to PPE will be implemented as necessary.

Field staff may also be exposed to other hazards that are encountered during field activities including slips, trip, and falls; working in proximity to heavy equipment, winches, suspended loads, hazardous energy sources, traffic hazards, and automobile use. Depending on the time of season, field staff may be exposed to biological hazards such as insect bites, stings, ticks, and snakes. Meteorological hazards such as lightning, wind, rain, and ultraviolet radiation may also be present. This PSHEP addresses the various hazards that may be encountered during completion of the SOW.

This PSHEP is based upon the Hazardous Waste Operations and Emergency Response (HAZWOPER) standard, The Parsons Environment, Safety, Health, and Risk Management Program (ESHARP) Manual, Version 4.0 , November 2011, and the Parsons Corporate Safety and Health Manual. The Parsons Corporate Safety, Health, and Environment (SH&E) Policy is provided in Exhibit 1-1. Honeywell safety requirements have also been incorporated.

1.1 PARSONS SAFETY, HEALTH & ENVIRONMENT POLICY

Exhibit 1-1 – Parsons Corporate SH&E Policy

PARSONS

Corporate Safety, Health & Environment Policy Statement

As an industry-leading engineering, construction, and technical services firm, Parsons is firmly committed to maintaining a safe, healthy, and environmentally compliant workplace at all its offices and project facilities. We have adopted the following code of ethics:

- We will hold Safety, Health and Environment (SH&E) as our highest core value.
- Executive management will lead the SH&E improvement process.
- SH&E will be a responsibility shared by everyone in our organization.
- SH&E performance will be a key indicator of our organizational excellence and will be incorporated into our business processes.
- We will communicate SH&E performance openly with employees.
- Employees will be given the knowledge and skills necessary to perform their jobs in a SH&E compliant manner.
- We will extend our SH&E efforts beyond the workplace to include travel, homes, and communities.
- We will continually strive to improve our SH&E processes.

To meet our SH&E objectives, all employees are expected to be actively engaged with regard to SH&E issues. This requires the combined efforts of a concerned management, responsible and knowledgeable supervision, and conscientious, well-trained employees.

Parsons will meet or exceed the applicable SH&E legal and other requirements and will continuously monitor and improve operations, procedures, technologies, and programs that are conducive to maintaining a safe, healthy, and environmentally compliant workplace.

Charles L. Harrington

Chairman and Chief Executive Officer

1.2 THE PROJECT SAFETY, HEALTH, AND ENVIRONMENT PLAN

Parsons' goal is zero accidents using control measures designed to minimize or eliminate hazards to personnel, process, equipment, the general public and the environment. This PSHEP outlines SH&E requirements and guidelines developed by Parsons for project work. When implemented, these requirements will help protect site personnel, visitors, the public, and the environment from exposure from incidents caused due to SH&E hazards. Parsons employees should never perform a task that may endanger their own safety and health, the safety and health of coworkers or the public, or damage the environment.

This plan should be updated as conditions or situations change, usually by addenda to the PSHEP. All Parsons and subcontractor personnel must understand and implement the PSHEP and any addenda. Parsons documents this process by having employees sign an acknowledgement form stating that they understand the PSHEP and its requirements.

1.3 SUBCONTRACTOR SAFETY, HEALTH, AND ENVIRONMENT PLANS (SSHEPs)

Subcontractors must establish a safety program for their work and employees. Contract specifications require all subcontractors to accept the Parsons' PSHEP and prepare their own SSHEP for work activities the subcontractor has responsibility for performing. The subcontractor will present the SSHEP to the Parsons' Project and Safety Managers at least 10 business days before site mobilization. At a minimum, subcontractor plans must meet the requirements of this PSHEP and provide SH&E equipment and safeguards suitable for the hazards involved. This PSHEP may not cover all potential hazards on every project, and subcontractors must ensure that appropriate SH&E information is available for all of the subcontractor's project tasks.

All PSHEP requirements for Parsons' personnel (e.g., training, substance abuse screening, and incident reporting, etc.) also apply to subcontractor personnel and will be included in the SSHEP, if applicable.

If the subcontractor is performing activities that require specialized training (i.e., confined space entry, excavation/trenching, scaffold use, HAZWOPER, etc.), copies of training certifications must be provided for applicable employees AND the supervisor. Refer to Section 5 for more details on SSHEP requirements and Safety Evaluation information.

For these projects, there will be subcontractors directly hired by Parsons. Each contractor hired by Parsons, regardless of whether they are performing intrusive work activities, must complete the Parsons Online Contractor Safety Evaluation (CSE) Program and maintain a subscription with a satisfactory rating in the Honeywell ISNetwork system before being eligible to work for Parsons. Detailed information concerning the Parsons CSE Program is covered in Section 5.4.

Below are the names of subcontractors and the work activities each will be performing as part of the Honeywell – Tonawanda Coke Site 108.

SUBCONTRACTOR	CONSTRUCTION ACTIVITIES
Ontario Specialty Contracting (anticipated)	Tank demolition and product removal

1.4 MANAGEMENT OF CHANGE (MOC)

An important aspect of project management that is equally important to safety management is the process for Management of Change (MOC). In accordance with Parsons' ESHARP requirements, field modifications may be made to this document after discussion and approval by the Parsons Honeywell Program Safety Manager. Make note of any pertinent notations in the comment section below (insert additional rows as necessary).

Requirements for MOC include:

- Documentation of the proposed change, including identification of affected documents and the changed conditions
- Independent design review of potential safety, health, and environmental impacts
- Identification of modified or new hazards as a result of change
- Resolution of safety, health, and environmental concerns generated during all stages of the review
- Approval and authorization of the change
- Communication (and training, if needed) of the change to affected personnel

PSHEP Section	SSO Initials	Date	Comments

SECTION 2

SCOPE OF WORK

Parsons, in its contracted role with Honeywell International Inc., will be conducting interim measures to address the aboveground storage tanks and the associated secondary containment areas at the subject site. The initial scope includes removal of three aboveground storage tanks and their remaining contents (tar and water) at Site 108 of the Tonawanda Coke Corporation (TCC) property in Tonawanda, NY. The anticipate scope is outlined below.

Piping and Ancillary Equipment Removal

Prior to removal of the tanks, piping and ancillary equipment associated with the tanks will be disconnected and removed to the extent necessary to facilitate tank removal. The pipe insulation was sampled on February 28, 2019 and found to contain asbestos. Asbestos removal procedures such as glove bags will be used to remove the asbestos insulation from the pipes, or the pipes will be cut in sections with the insulation intact. Pipe and equipment removal will be done using a combination of cutting and mechanical shearing. Contaminated piping and ancillary equipment will be wrapped in 6 mil poly and transported to the decontamination area for cleaning , as necessary. All non-contaminated piping and ancillary equipment removed will also be taken to the decontamination facility before transport off-site for disposal or salvage. Remaining piping will be inspected and the ends blind flanged if tar is present in the pipes.

Tar and Water Removal and Tank Demolition

Based on preliminary evaluations, it is anticipated the tar will be stabilized *in situ* prior to removal from the tanks through the use of a stabilization agent such as wood chips/saw dust, lime kiln dust, cement kiln dust, or other applicable substances. This assumption forms the basis for the removal plan detailed below. If subsequent evaluations, including review of tank content testing results (anticipated mid-May) and subsequent discussions with disposal and recycling facilities, determine an alternative removal approach, such as heating and pumping, is more appropriate, details will be provided to United States Environmental Protection Agency (USEPA) for approval prior to implementation.

Removal will begin with the demolition and removal of the top portion of the tanks. To decrease the hazards associated with the tar remaining in the tanks, the demolition will utilize cold cut and mechanical shear procedures. The tanks will be demolished from the top down to about two to three feet above the current tar levels. The remaining bottom portion of the tanks will be left in place and utilized as a mixing basin to stabilize the tar.

Prior to stabilization, water remaining in the tanks will be removed and managed as discussed below. The stabilization agent will then be added in an adequate quantity to ensure that the mixed material passes the paint filter test before removal from the site. Load-out and off-site disposal of the stabilized tar will begin following stabilization of tar from the first tank. After completion of stabilized tar removal from the tanks, the bottom portion of the tank walls will be demolished.

Scrap metal from demolition be further downsized and processed for off-site recycling or disposal as discussed below.

Tar Reuse/Disposal

Prior to offsite reuse or disposal, the tar in the tanks will be undergo laboratory analysis to determine the most appropriate management approach. Samples of the remaining tar in the tanks were collected on April 11, 2019. The results of this testing and the proposed material management approach will be provided to USEPA for approval prior to mobilization to the site.

Tank Metal Management

The tanks will be cut into manageable sized pieces and moved to the decontamination area. If the metal can be successfully decontaminated, it will be collected in the staging area post-decontamination in preparation for off-site removal to a salvage facility. If it determined that decontamination is not practical, the metal materials will be managed for disposal at an appropriate disposal facility.

Water Management

Site conditions and water levels within the berms are monitored monthly and after significant precipitation events. If water levels within the secondary containment comes within two feet of the top of the berm at any location, water removal will be implemented. As specified in the Interim Measures Work Plan, pending analytical results, review and approval by the Town of Tonawanda wastewater treatment plant and approval from the USEPA for discharge to the Town of Tonawanda sanitary system if water removal from within the berms is required, it will be discharged either directly to a nearby sanitary manhole along River Road or trucked to a nearby discharge point. In anticipation of the need for water removal, Honeywell has sampled water from within the berms and based on those results and discussions with the Town of Tonawanda, it is anticipated that discharge of this water to the sanitary sewer system will be acceptable.

Water is also present within the tanks. Samples of the water in the tanks were collected on April 11, 2019. The results of this testing and the proposed water management approach will be provided to USEPA for approval prior to mobilization to the site. This water is presumably contaminated due to being in direct contact with tar. Contaminated water will also be generated during tank and equipment decontamination. Contaminated water from these sources will be containerized as necessary and sampled for potential discharge to the sanitary sewers. If sampling indicates discharge to the sanitary sewers is not appropriate, it will be pretreated as necessary prior to discharge to the sanitary sewers or disposed of off site. All sample results and the proposed management approach will be provided to USEPA for approval prior to implementation.

2.1 POTENTIAL HAZARDS

Electrical

Overhead power lines, downed electrical wires, and buried cables all pose a danger of shock or electrocution if contacted or severed during site operations. A minimum distance of 10 feet (ft.) will be present between overhead wires and equipment. This distance will vary according to voltage, the greater the voltage, the greater the clearance between any part of the equipment and the power line. A spotter will be utilized to maintain a safe distance between equipment and overhead wires. Overhead electrical power lines will be considered energized unless the person owning such line, or operating officials of the electrical utility supplying the line assures that it is

not energized, and it has been visibly grounded. Only the utility company is authorized to de-energize, insulate, or handle the lines. No one else may attempt these operations.

Electrical equipment used on-site may also pose a hazard to workers. Whenever possible, contractors will use low-voltage equipment with ground-fault interrupters and watertight, corrosion-resistant connecting cables to help minimize this hazard. All electrical wiring and equipment will be intrinsically safe for use in potentially explosive environments and atmospheres. Ground-fault circuit interrupters are standard for use at the site.

In addition, lightning is a hazard during outdoor operations, particularly for workers handling metal containers or equipment and working on a water craft on the Lake. In the event of an electrical storm, all operations will cease for the duration of the storm.

Heavy Equipment/Vehicle Traffic

Some Operation, Maintenance, and Monitoring (OM&M) activities take place in close proximity to construction activities and heavy equipment. Workers should not take any action unless they have made eye contact with the operator and clearly communicated their intentions. In addition, all equipment and vehicles must be equipped with back-up alarms, which are checked daily and if not operating properly, removed from service and repaired immediately. Truck traffic will be controlled by a flagger/spotter, as required.

Material Handling

Various materials and equipment may be handled manually during project operations. Care should be taken when lifting and handling heavy or bulky items to avoid back injuries. The following fundamentals address the proper lifting techniques that are essential in preventing back injuries include but are not limited to:

- The size, shape, and weight of the object to be lifted must first be considered. Multiple employees or the use of mechanical lifting devices are required for heavy objects.
- The anticipated path to be taken by the lifter should be considered for the presence of slip, trip, and fall hazards prior to lifting any object.
- The feet will be placed far enough apart for good balance and stability (typically shoulder width).
- The worker will get as close to the load as possible. The legs will be bent at the knees.
- The back will be kept as straight as possible and abdominal muscles should be tightened.
- Twisting motions should be avoided.
- A worker will never carry a load that cannot be seen over or around.

When placing an object down, the stance and position are identical to that for lifting. The legs are bent at the knees and the object lowered. When two or more workers are required to handle the same object, workers will coordinate the effort so that the load is lifted uniformly and that the weight is equally divided between the individuals carrying the load. When carrying the object, each worker, if possible, will face the direction in which the object is being carried.

In handling bulky or heavy items, the following guidelines will be followed to avoid injury to the hands and fingers:

- A firm grip on the object is essential; leather gloves will be used if necessary.

- The hands and object will be free of oil, grease, and water which might prevent a firm grip and the fingers will be kept away from any points that could cause them to be pinched or crushed, especially when setting the object down.
- The item will be inspected for metal slivers, jagged edges, burrs, and rough or slippery surfaces prior to being lifted.

Hand and Power Tools

Hand and power tools are used for various site activities. Procedures for using hand and power tools are as follows:

- Persons using power tools will be trained in their use.
- Ground Fault Circuit Interrupters must be used for all electrical tools unless built in to the providing generator.
- Only tools in good condition will be used.
- Tools will be kept clean.
- Guards and shields will be kept on all tools.
- Air couplings will be secured.
- Non-sparking tools will be used in hazardous areas.
- Proper eye protection is critical when using power tools. At a minimum, safety glasses will be required during site operations. Where appropriate, full-face shields will be utilized in addition to the glasses.

Chemical Hazards

Operational chemicals may be brought to the project site for use in activities supporting the OM&M activities. These chemicals are used for fuels in operating heavy equipment, glues for welding pipes, herbicides for invasive species management etc. The use of operational chemicals is regulated by Occupational Health and Safety Administration (OSHA) under the Hazard Communication Standard (29 CFR 1910.1200). Safety Data Sheets (SDS) for operational chemicals must be kept on-site. An inventory list of the anticipated operational chemicals (Hazardous Chemical Inventory List) for use at the site will be maintained at the site and updated as new material is received.

Activities are being completed on sites where remedial construction activities have been completed or where contaminant concentrations are below remedial criteria. Risk of exposure to site workers is zero to minimal.

2.2 PROJECT SAFETY, HEALTH AND ENVIRONMENT PLAN APPLICATION

This PSHEP and referenced documents applies to all locations, facilities, operations, and projects associated with the scope of work to be performed by Parsons and its subcontractors. The provisions of this plan are mandatory for all Parsons personnel engaged in activities consistent with the scope of work. Subcontractors working for Parsons must prepare and administer a plan with equivalent requirements unless otherwise specified. All Parsons and Parsons' contract personnel who engage in project activities must be familiar with this plan and comply with its requirements.

SECTION 3

PROJECT SH&E SAFETY MANAGEMENT RESPONSIBILITIES AND AUTHORITY

3.1 SAFETY, HEALTH AND ENVIRONMENT (SH&E) RESPONSIBILITY MATRIX

Exhibit 3-1 summarizes the responsibilities of selected roles related to the primary SH&E activities identified in the PSHEP.

EXHIBIT 3-1
ROLES AND RESPONSIBILITIES

Project Responsibility Matrix		Project												BU								Corporate					
Phases	Work Elements	Project Manager	Safety & Health	Environmental	Construction/Site Management	Engineering	First Line Supervision	Facilities and Maintenance	Training	Contracts/Procurement	Security	Sustainability	Quality	President	Operations/Risk Management	Division Management	Sector Management	Safety, Health & Environment	Quality	Business Development	CEO	Operations/Risk Management	Safety, Health & Environment	Security	Workers' Compensation	Insurance
Introduction to ESHARP for Project	1. ESHARP Project Management	R	D	D	P	P	P	P	P	P	P	P	P	P	P	P	P	A	P	P	P	P	P	P	P	P	P
Business Development	2. Business Development	R	P	P	P	P				P				P	P	A	P	P	P	D	P	P	P	P		P
Startup	3. Initial Hazard Analysis and Planning	A	R	D	P	P					D							P					P	P		
	4. Project Safety Health, and Environmental Plan (PSHEP)	A	D	D	P										P	P	P	R					P	P		
	5. Stakeholder PSHEP Alignment Meeting	A	D	D	P													R								
Construction and/or Field	6. Preconstruction Safety, Health & Environment Activities	A	D	D	P		P						P				P	R	P					P		
	7. Project/Site Orientation, Training, and Recurring Field SH&E Meetings	A	D	D	P		P	P	P									R						P		
	8. SH&E Committee	A	D	D	P		P	P			P							R						P		
	9. Meet Building Trades, Safety, Health, Environmental Regulatory Agencies, & Others	A	D	D	P													R						P	P	
	10. Review Contractor/Subcontractor SH&E Programs	A	D	D	P					P								R						P		
	11. Subcontractor Premobilization Meeting	A	D	D	P	P				P	P							R						P		
	12. Risk Mitigation Planning (2-week look ahead)	A	D	D	R													D						P		
	13. Activity Hazards Analysis	A	D	D	P	P	P	P										R						P		
	14. Project Management Site Safety, Health, & Environmental Inspections	A	D	D	P											P	P	R	P					P		
	15. Audits, Inspections, and Recordkeeping	A	D	D	P		P						P			P	P	R	P					P		
	16. Incident Management Process	A	D	D	P		P						P		P	P	P	R	P					P		P

EXHIBIT 3-1
ROLES AND RESPONSIBILITIES (CONTINUED)

Project Responsibility Matrix		Project												BU							Corporate					
Phases	Work Elements	Project Manager	Safety & Health	Environmental	Construction/Site Management	Engineering	First Line Supervision	Facilities and Maintenance	Training	Contracts/Procurement	Security	Sustainability	Quality	President	Operations/Risk Management	Division Management	Sector Management	Safety, Health & Environment	Quality	Business Development	CEO	Operations/Risk Management	Safety, Health & Environment	Security	Workers' Compensation	Insurance
Testing, Commissioning, Operations, and Decommissioning	17. Management Systems and Transition	A	R	R	D	P	P	P	P		P	P	P	P	P	P	P	P	P		P	P	P	P		P
	18. Equipment and Systems Integrity	A	P	P	R	P	P	D	P				P					P	P				P			
	19. Operations Training and Education	A	D	D	P	P	P	P	P		P		P					R					P			
	20. Assessments and Corrective Action	A	D	D	P	P	P	P	P		P		P					R					P			
	21. Operations Emergency Management	A	P	P	P	P	P	P	P	P	D		P					R					P	P		
	22. Safe and Environmentally Compliant Work Practices	A	D	D	P	R	R	P	P									P					P			
Closeout	23. Lessons Learned and Final SH&E Report	A	D	D	P											P	P	R	P				P			
	24. Records Retention	A	P	P					P		D		P					R	P				P			

R – Responsible and accountable for ensuring the project develops and implements the work element.
D – Develops the plan, tool, training, document, or other item needed for the work element.
P – Participates by providing advice, assisting in the implementation or development, reviewing and providing comments, or otherwise supporting the development or implementation effort.
A – Approval at the management level with responsibility for the project; establishes requirements for the project or serves as sponsor for the item.

SECTION 4

ADMINISTRATIVE PHASE

4.1 PROJECT SAFETY, HEALTH & ENVIRONMENT (SH&E) COMMITTEE

The project must have a SH&E Committee if more than five full-time Parsons employees or when 25 or more Parsons and subcontractor employees are assigned to the project. Based on the anticipated SOW for calendar year 2019, a project safety committee is not expected.

4.2 PROJECT (EMPLOYEE) ORIENTATION

The project has a comprehensive employee orientation program. The SH&E personnel help to develop applicable SH&E sections of the orientation and meet with new employees to review site procedures and requirements (Exhibit 4-1). Topics covered in the PSHEP orientation include:

- PSHEP overview
- Project rules and disciplinary policies
- Reporting emergencies, incidents and unsafe conditions
- Near miss reporting
- Hazard communication
- Emergency/evacuation plans
- WorkCare
- Spill/release reporting and response actions
- Waste management
- Stormwater and wastewater management
- Scope of work
- Names of personnel responsible for site safety and health
- Communication protocol/suggestion box
- Safety, health, environment and other hazards at the site
- Review of all activities on-site and related Activity Hazard Analysis (AHAs)
- Proper use of PPE
- Work practices by which a worker can minimize risk from hazards
- Safe use of engineering controls and equipment on-site
- Acute effects of compounds at the site
- Decontamination procedures
- Other applicable environmental issues and regulatory requirements
- Stop Work Authority
- Biological hazards training

All personnel, including subcontractors, new hires, transfers, union workers and visitors on a project must attend the site orientation program on their first day and sign an acknowledgement form indicating they attended, received and understood the orientation. Any individual who is unsure of any information presented in the orientation must request clarification. Individuals who do not participate in the orientation or refuse to sign the acknowledgment when requested will not be granted access to the site. The Field Safety Manager will provide employees with Orientation.

4.3 AWARENESS CAMPAIGN

The project has an awareness program consistent with the Parsons SH&E awareness campaign in its various elements (e.g., signs, posters, banners, and focus briefings). This program promotes worker awareness of SH&E goals and daily risks, hazards, and exposures in the field. In addition to topics selected by Corporate Safety each month, the project will supplement the awareness program with information specifically applicable to the SOW. The Project Safety Representative may also provide training, presentations, or informational materials as part of the awareness campaign.

The SH&E bulletin board maintained by the Project Safety Manager (PrSM)/Site Safety Officer (SSO) is the primary information point for the project awareness campaign. Bulletin boards will be set up in field trailers as appropriate. The PrSM/SSOs may also provide training, presentations, or informational materials as part of the awareness campaign.

4.4 STAKEHOLDER PROJECT SAFETY PLAN ALIGNMENT MEETING

A stakeholder PHESP alignment meeting will be held before beginning any field work. The meeting allows Parsons to focus and coordinate efforts, obtain input for improvements and gain concurrence from all stakeholders for execution of the PSHEP. The following representatives should be in attendance for the PSHEP alignment meeting:

- Honeywell – TBD
- Parsons – Tom Abrams, PrM
- Parsons - Bill Moon, PrSM
- OSC Project Manager – TBD
- OSC CM/Superintendent – TBD

Parsons should present the PSHEP and obtain stakeholders concurrence with the approach outlined in the plan. The meeting should include a review of stakeholder roles and responsibilities and elements of control appropriate to the project risks.

4.5 TRAINING

The project will develop an SH&E training program tailored to the SOW. All employees receive a general project orientation as outlined in Section 4.2 upon assignment to the project. All office-based employees, field employees and new hires who spend a significant portion of their time in an office or field trailer shall receive a specialized office training including the following topics as appropriate:

- Proper lifting techniques
- Biological hazards (ticks, bees, poison ivy, etc.)

- Ergonomics
- Housekeeping
- Common office hazards and environmental risks (if any)
- Waste management
- Office procedures
- Evacuation/Drills/Emergencies
- Other relevant topics

Field-based employees and office employees who spend a significant portion of their time in the field also receive field training as appropriate and as described in Section 7 of this PSHEP including the following topics:

- PPE
- Defensive driving
- Lifting
- Back safety
- Cardiopulmonary resuscitation (CPR)/first aid/automated external defibrillator (AED) and blood borne pathogens
- Electrical safety
- Overhead hazards
- Emergency response
- Fire Prevention
- Housekeeping
- Hand tools/Power tools
- Hazard communication: Identifying the Danger
- Honeywell accident/incident reporting procedures
- Parsons accident/incident reporting procedures

They may also receive the following training as applicable to a specific task:

- Lockout/Tagout (LOTO)
- Stairs / ladders

All personnel engaged in hazardous substance removal or other activities that expose or potentially expose them to hazardous substances or health hazards shall receive appropriate training as required by 29 CFR 1910.120, including, but not limited to, initial 40-hour, 8-hour Supervisor and annual 8-hour refresher training.

4.6 AUDITS AND INSPECTIONS

The SH&E manager has implemented an audit and inspection program in conjunction with the Corporate SH&E Departments. The Project Manager (PM), or their designee, in accordance with Section 6.5 conducts weekly site inspections. Additional inspections will also be completed when a significant task is being performed (e.g., soil/sediment sample collection, sample surface

water collection, major restoration efforts by subcontractor, etc.). If the PM is not on-site, the most senior person on-site will conduct the inspection. Inspections and audits are intended to identify unsafe behaviors or conditions and implement corrective actions before an incident occurs. Completed inspections will be saved in the project files. Additional information on audits and inspections during construction is detailed in Section 6.5 of this PSHEP. All noted deficiencies and corrective actions will be tracked with the use of a tracking log. The PrSM will evaluate inspection and audit results and provide a summary to the Safety Steering Committee. When appropriate, Safety Bulletins will be issued to convey safety lessons from near misses or incidents that are applicable to our own circumstances for the purpose of continuous improvement. In accordance with the Parsons' safety protocol, safety inspections and audits are required to be performed in the manner and frequency described below.

4.6.1 Periodic Safety Audits

Projects will be selected at the discretion of the SH&E Manager for periodic project audits. These audits will generally be more comprehensive in nature and will include a documentation review as well as a site walk-through. Completed inspections will be sent to the safety Director and will be summarized in the next Monthly Safety Report. The Safety Director will forward inspection results to the Safety Manager so that corrective actions can be tracked to conclusion.

4.6.2 Corrective Actions

Deficiencies identified by audits and inspections will be logged in a deficiency tracking log. Any deficiencies that cannot be immediately corrected must be assigned to a specific individual with a reasonable completion date. The Safety Manager or the designated SSO will track corrective actions, verify their closure, and update the Corrective Action Tracking Log or equivalent. Findings of a severe nature or that indicate a declining site safety trend may warrant notification of subcontractor's senior management. Ongoing failure to implement safety requirements as by applicable regulations, the contract, and may be considered a breach of contract and result in the subcontractor's removal from the project.

The PrSM has implemented an audit and inspection program in conjunction with the corporate safety and quality assurance departments. The PM, together with the Field Team Leader or the SSO, will conduct a safety inspection each month. Office work areas (including trailers) are audited according to the corporate office audit standards.

4.6.3 Employee Based Inspections (EBS)(Observations)

This project will utilize the EBS system for field inspections and observations by conducting periodic Behavior Based Observation (BBOs). BBOs are about conducting worker observations, providing positive reinforcement for **significantly important behaviors** that are correct and consistent with company work standards, and constructively identifying and eliminating deviations from these work standards.

Observations shall be recorded electronically in the field typically by management personnel utilizing IndustrySafe® proprietary software located on the PWEB. Unsafe acts or situations shall be immediately corrected, if possible. Items which cannot be corrected shall be logged as incomplete within the system for corrective action tracking. Data shall be uploaded to a central database maintained by IndustrySafe®. IndustrySafe® has set up a database specifically for this

project where inspections, trends and collected data can be reviewed by the entire project management team.

Personnel responsible to perform employee observations typically shall consist of project management staff. For this project, the personnel performing observations shall include the following:

- PM
- SSO
- Field Team Leader

A metric of 1 inspection or observation per week has been established by the Program Safety Director. Due to the effectiveness of an unscheduled random inspection model, as well as project management scheduling, these inspections may or may not be performed in any given week or performed above the quota during higher risk activities. The PSM shall be responsible for stewardship of this inspection program.

4.7 SH&E MEETINGS

All project meetings that include five or more people must begin with a SH&E moment. The meeting chairperson may present the SH&E topic or ask for a volunteer to open the discussion. In general, these "SH&E moments" are brief, perhaps a minute or two, and should be directly relevant to the work of the day or applicable to most employees (e.g., non-work-related injuries, waste management procedures, effects of stormwater discharges, home exposure to hazards materials, etc.). Monthly all hands SH&E meetings are held to review critical safety procedures, discuss safety incidents, and celebrate safety milestones. The PM announces the time and schedule of these meetings at least one week in advance.

Daily toolbox safety meetings are held with all personnel at the beginning of each shift to review current site conditions, incidents, or injuries from the previous shift activities, safe or at-risk observations from the previous shift, activities planned for the current shift, anticipated hazards, engineering controls, work practices, PPE to protect against hazards, and any additional safety topic or comments. Toolbox safety meetings shall be documented and signed by all individuals accessing the site using a Safety Meeting Sign-In Sheet.

4.8 REWARDS AND RECOGNITION

4.8.1 Rewards and Recognition Program

At Parsons we expect every employee to work safe. We do offer incentives for those who proactively go the extra yard, or mile, to make Parsons an even safer place to work. Our incentive program is project-based but similar across all Parsons' projects.

Things that we want to incentivize (and why):

1) **Near-Miss Reporting** (The root cause of a near miss is generally identical to the root cause of a "hit". If we report near-misses, find their root causes and actually fix them we have lowered the potential for having an incident.) Employees who submit near-misses may be eligible to receive a Red Safety Token that can be exchanged for items. (Red Tokens are a Corporate way of giving thanks for safety efforts.)

2) **Good or Great Ideas that make the job safer** or **Significant Safety Observations** (Many employee ideas go unrecognized because we never hear about them.) Please let your PM/Superintendent or SSO know what your idea is to make Parsons a safer place to work. Employees who submit ideas that are implemented (as determined by the Project Safety Committee or, the PM/SSO) or make significant observations (saw a hazardous condition and reported it; made an adjustment to a task to make it safer, etc.) that the site leadership team can act upon, may receive Red Safety Tokens that can be exchanged for items as determined by the Rewards and Recognition Committee.
3) **Employees that go the extra yard to improve the safety program** (Our program only gets better if all members of the team understand and contribute to our zero injury goals.) Emergency Response Team (ERT) Members, Employee Based Safety (Industry Safe) volunteers, safety committee members, those who contribute to AHA development and others, may be eligible to receive a Safety Token.
4) **Sustained, high performance by a site team/project** (No one gets hurt!) Teams, projects or, even the entire portfolio who maintain a high level of safety consciousness as exhibited by a high level of near-miss reporting, overall safety culture, quality H&S observations, etc., can be recognized by virtue of a safety breakfast/lunch or, Honeywell/Parsons recognition token gift.

SSOs will work with their PMs to determine the rewards and recognition program appropriate for the project and will be responsible for local administration of this program. They are also responsible for inter-portfolio sharing of the near-misses reported as well as the great ideas that are surfaced. PMs will budget for this recognition program. Charges will go to project/program overhead. Employees who receive tokens will be tracked for audit purposes. SSOs will collect red tokens when awarding gifts.

4.9 MEASUREMENT AND REPORTING

Complete incident reporting guidelines are provided as Exhibit 4-2 of this section.

4.9.1 Emergencies

For emergencies, call 911!

4.9.1.1 Emergency Response Team – Not Used

4.9.1.2 WorkCare

Parsons and WorkCare have partnered together to promote Incident Intervention™, a resource designed to provide Parsons' employees with immediate access to qualified medical clinicians who are able to provide our employees with prompt medical assessment in the event of non-life threatening, non-medical emergency work related injury or illness. Each of Parsons' subcontractors is required by contract to participate in this program. Through this process, Parsons can leverage clinical expert resources to coordinate appropriate treatment care. WorkCare serves as a "medical advocate" for the employee, the WorkCare clinician provides responsive evaluation of the incident, assists the employee/employer in determining the most appropriate course of action, and consults with the treating physician.

4.9.1.3 Work-Related Injury Procedures

For Emergencies

If there is a life threatening or significant medical event (e.g., not breathing, no heartbeat, unconscious, open wound, amputation, obviously broken arm or leg, etc.), then the first employee on the scene should:

1. Call for help
2. Call 911
3. Begin first aid/CPR if trained

For Non-Emergency, Non-Life-Threatening Work-Related Injury or Illness

Upon notification of a non-life-threatening illness or injury event the **Field Team Leader** will:

1. Make sure that 1st Aid/CPR trained employees are on scene and assisting the injured.
2. Make sure that any ancillary work ceases to make scene safe for responders.
3. Contact the SSO; For anything beyond a minor band-aid case the SSO will confer with Bill Moon (315-323-8175) to determine if WorkCare shall be called.
4. If determined, contact WorkCare and allow the injured employee to speak with a WorkCare doctor or nurse.
5. Follow WorkCare guidelines; Drive the employee to the clinic if directed and stay with him/her until the visit is concluded.
6. Provide the employee with "Questions to Consider Asking Your Doctor During a Clinic Visit."
7. Provide the employee with "Memo to Treating Medical Professional" prior to the employee going into the exam room.
8. Participate in the incident investigation process upon return to the site.

To coordinate the WorkCare triage process, it is imperative that Parsons' employees report all work-related injuries immediately to their supervisors.

For work-related injuries or illnesses that may require physician direction on appropriate treatment, Parsons' employees should then promptly contact WorkCare, ideally before seeking medical care, as this will provide the greatest opportunity for appropriate intervention.

If an injured employee requires medical care for a work-related injury/illness, the Order for Treatment of Work-Related Injury/Illness Form MUST be sent with the injured worker and/or faxed to the occupational medicine clinic at the time of the initial evaluation. See Exhibit 4-3.

WorkCare's Incident Intervention is available 24/7 and 365 days per year.

WorkCare contact number is 1-888-449-7787.

Be prepared to provide the following:

- Injured worker's name
- Injured worker's contact number
- Injured worker's location (at a minimum include the city and state)

- Employee ID number
- Employee's Market
- Employee's project or office location
- Functional manager's name

Near-Miss Reporting

In an effort to streamline near-miss reporting, especially for employees conducting fieldwork who do not have real-time web access, will contact the PM or the Safety Manager for assistance. All entries will be saved as initial and can be accessed by the caller when they return to their computers. Entry into the database does not relieve the caller from the responsibility of following through with the near-miss investigation or of notifying other employees in the office or project team of the occurrence.

Callers will be prompted to provide the following information:

- Name and phone number
- Date of near-miss
- Location
- Project number (if applicable)
- Brief description of what happened
- What you think happened if this situation resulted in injury or damage
- Any other information you think may be important

The intent of this service is to enable employees to phone in near-misses immediately and have events entered into the Parsons Industry Safe database. As we all know, the expectation is that immediately after having a near-miss, Stop Work Authority will be used to ensure the area is safe and determine what changes must be made before it is safe to proceed.

4.9.2 Measurement and Compliance

The PM and PrSM establish and post a measurement system to provide indicators of safety performance, including the following metrics for the project:

- Project start date
- Days without a recordable injury
- Date of last OSHA recordable injury (if applicable)
- Percent of safe observations from each monthly audit

Subcontractors must submit a monthly report of incidents, exposure hours (hours worked on the project, paid or unpaid) to the Parsons PM within three (3) days after the end of each month. The PM compiles the figures and submits them to the PrM (or via the online safety reporting system if instructed by the PrM) by the first Friday of each month; where necessary, estimated figures are acceptable. If a project involves air monitoring or personnel wearing any type of respirator, a monthly Field Project Report is also completed and submitted to the SH&E Director by the 3rd calendar day after the end of each month.

To accurately measure performance and comply with corporate and regulatory requirements, Parsons and its subcontractors have an emergency communications system to contact the following onsite offices for the events listed below:

All incidents	*(Program Manager) Tom Abrams (315-552-9670)*
Worker injury or exposure	*(Program Safety Manager) Bill Moon (315-323-8175)*
Hazardous material/contaminant releases	*Site Emergency Response Lead (315-715-1800)*
Fires/explosions	*Fire (911)*
Medical emergencies	*First Aid/Medical (911)*

This notification information should be provided to site workers in either posters or individual wallet cards that can be distributed to site workers. In addition, this information should be prominently displayed in the PSHEP (e.g., on the back of the plan cover).

The SH&E Manager has established a measurement system to provide indicators of SH&E performance, including the following metrics:

- Consecutive days without a recordable incident
- Consecutive days without a days-away-from-work incident
- Recordable incident rate
- Days-away-from-work incident rate
- Contaminant exposures monitored and over exposures documented
- Environmental citations from regulatory agencies
- Total number of environmental spills and/or releases recorded
- Environmental spills and/or releases requiring reporting (e.g., Reportable Quantities)
- Number of monthly audit findings by type (i.e., safety, health and environmental)

4.9.3 Incident Reporting

Employees involved in or witnessing an injury, worker exposure, environmental incident, or near miss must immediately report it to the responsible Field Team Leader, who in turn immediately relays the report to Parsons Project SSO. No Field Team Leader may decline to accept or relay a report of SH&E incident or significant near miss from a subordinate.

The PM must ensure that all SH&E incidents are reported to the SH&E and other management personnel (as required) within four hours. The Project SSO (who has been trained on Parsons' reporting requirements and Online Safety Reporting System) prepares and submits SH&E reports. The PrSM sends reports to the required management personnel and validates that client reporting requirements are also met.

The PrSM must notify the local OSHA office and/or regional, municipal and/or local regulations office in writing within 8 hours if an accident involves any work-related fatalities within eight hours of the event and all work-related in-patient hospitalizations, as well as amputations and losses of an eye, to OSHA within 24 hours of the event. In addition, spills/releases

of reportable quantities and other reporting required by environmental regulation are the responsibility of the PrSM.

The PM and Safety Director must be notified by the SHSO of any incident as soon as it is safe to do so but within the notification guidelines identified in the following table. After notification, written incident reports must be submitted by the SHSO to the Safety Director in accordance with the time frames shown in the Attachment B. The Safety Director's delegate shall then enter incidents into the Honeywell Event Reporting System within the applicable time frames which can be found in Attachment B of this PSHEP. If the Safety Director is unavailable, then the Safety Manager shall assume or delegate Safety Director's responsibilities in an effort to support timely incident reporting and follow-up.

For a complete listing of Tier 1, 2, and 3 examples see Attachment B.

Monthly Statistics Summary Reports

Root causes must be identified, and corrective actions implemented. The Safety Manager can assist project SSOs in reviewing and tracking incident reports as well as following up on completion of corrective actions. The SSO shall update the Safety Manager as corrective actions are implemented and completed. The Safety Manager will track and verify completion of corrective actions on the Corrective Action Tracking Log or equivalent.

The Safety Director will summarize incidents on the next monthly Safety Report following the incident. The timeliness of incident reporting and any significant "Lessons Learned" will be included in the summary.

A Honeywell Notification/Activation Decision Table is also presented in Attachment B.

In addition to the Honeywell incident notification requirements, Parsons' employees involved in or witnessing an incident or near-miss incident must immediately report it to the responsible SSO, who in turn immediately relays the report to Parsons PM. Near-miss incidents that could cause significant injury or loss of life must be immediately reported, in the same manner as an actual incident. No supervisor may decline to accept or relay a report of injury or significant near-miss incident from a subordinate.

The PM must ensure that all incidents are reported to the Safety Manager and other management personnel (as required) within four hours. The PM (who has been trained on Parsons' reporting requirements and Online Safety Reporting System) then prepares and submits the incident information.

The Program Safety Manager, or their designee, must notify the local OSHA office immediately if an accident involves the death of an employee or hospitalization of three or more workers.

Subcontractors must submit a monthly report of exposure hours (hours worked on the project, paid or unpaid) to the Parsons PM within four days after the end of each month, or as specified by the contract. The PM compiles the figures and submits them via the online safety reporting system by the first Friday of each month. If necessary, estimated figures are acceptable, but the reports must be filed.

4.10 INCIDENT INVESTIGATIONS

All accidents, worker over exposures, environmental incidents and significant near misses are investigated by an individual or team with training in incident investigation and root cause analysis. Subcontractors must investigate incidents involving their employees or activities and submit an investigation report to the Parsons PM within 48 hours of an incident.

In Parsons, the PrSM investigates or assigns an investigator to each significant incident. The investigator submits a final investigation report using the online safety reporting system within 72 hours of the incident. The Project SSO maintains the investigation file.

4.11 RESPONSIBILITY/IDENTIFICATION OF KEY LINE PERSONNEL

For project responsibility and identification of key personnel.

Project Key Personnel

Project Office:	Syracuse, New York	
Address:	301 Plainfield Road, Suite 350 Syracuse, NY 13212	
Telephone 315-451-9560	**Fax 315-451-9570**	**Email**
Company Executive responsible for project		**Contact No.**
Pratima Poplai		Direct Line: (732) 537-3552 Cell Phone: (732) 853-4957 Email: Pratima.Poplai@parsons.com
Market SH&E Director		**Contact No.**
Jason Townsell		Cell: (562) 565-3491 Jason.Townsell@parsons.com
Site Project Managers		**Contact No.**
Tom Abrams		Direct Line: +1(315)552-9670 Cell: 315-263-5109 Tom.Abrams@parsons.com
Program Safety Manager (PrSM)		**Contact No.**
Bill Moon		Cell Phone: 315-323-8175 William.moon@parsons.com
Site Safety Officer (SSO)		**Contact No.**
TBD		Cell Phone:
Client Project Management POC		**Contact Information**
Steve Coladonato		Direct Line: (302) 791-6738 Cell Phone: (973) 216-2438 Email: Steven.Coladonato@Honeywell.com

The personnel listed above have the authority and responsibility for implementing the provisions of this project.

4.12 MEDICAL REQUIREMENTS AND WORKERS' COMPENSATION

In accordance with corporate requirements, the SH&E Manager has established and implemented the following medical requirements for the project:

4.12.1 Substance Abuse Tests

Honeywell and Parsons are committed to maintaining a safe and healthy work environment for its employees, its subcontractors and the community. Honeywell and, Parsons recognize that on-the-job, as well as off-the-job, use of drugs and consumption of alcohol can have a negative impact on job performance, endanger individual safety, the safety of co-workers, and the community. Contractor crews are covered by the drug and alcohol policies of their employers.

NOTE: Parsons Employees and subcontractors are subject to additional post accident drug testing requirements that include (but are not limited to) company vehicles and high-risk power tools. Refer to Parsons Employment Standards Rev 3, Appendix 4 –Substance Abuse.

Policy

In an effort to establish a substance abuse-free workplace and with an understanding that *subcontractors* often perform *Safety-Sensitive Activities*, Honeywell and Parsons require *subcontractors* to have a Drug-Free Workplace Policy that meets or exceeds this policy when working on Honeywell projects and/or property. See Exhibit 4-4 for Parsons Corporate Substance Abuse Policy.

Pre-Access

The PM shall require project personnel to have pre-access drug and alcohol screening within **two weeks** prior to the commencement of field work.

- Pre-access testing is not necessary if subcontractors have been off-site **≤30 days**.
- Short-term subcontractors needed to provide emergency response support or unscheduled repairs to critical on-site equipment may be exempted from pre-access testing if approved by the Portfolio Safety Manager or Market SH&E Director.
- The PM will document approved exemptions in pre-work planning documents associated with unscheduled repairs of critical equipment.
- Exemptions may be extended for a maximum of **three days** after which time exempted subcontractors must tested for drugs and alcohol.

Reasonable Suspicion

Reasonable suspicion testing may be triggered by direct observations of employee behavior or drug-related paraphernalia. Site personnel who have been observed using alcohol or controlled substances on site or during breaks at off-site locations after which they will return to work will be requested to take an alcohol or drug test. Reasonable suspicion includes possession (on person or in vehicles) of alcohol or controlled substances on site as well as paraphernalia that suggest drug use. Site personnel who exhibit signs, symptoms, or behaviors of drug or alcohol use as interpreted by a reasonable person will also be requested to take a drug and/or alcohol test. Reasonable suspicion drug testing must be conducted **as soon as feasible not to exceed four hours**.

Post-Accident

Honeywell reserves the right to drug and/or alcohol test Parsons or subcontractor personnel involved in an accident. Honeywell requires Parsons or subcontractor personnel to submit to an alcohol test within 2 hours and to a drug test within 32 hours after an accident. If the alcohol test is not collected within 8 hours and the drug test within 32 hours after an accident, then the Safety Director will cease efforts to have the tests collected and document the reason for failing to collect these tests. Failure to cooperate with drug and alcohol testing procedures may result in disciplinary action up to and including removal from site for a minimum of one year.

Project Drug & Alcohol Screen

The Safety Director may select specific projects for drug and/or alcohol testing at his discretion. Project personnel will either be randomly selected from the total project personnel, or on smaller projects, all project personnel will be tested. Parsons engineering and construction management personnel routinely working on-site shall not be excluded from testing.

Commercial Motor Vehicle Drivers

Project personnel who operate commercial motor vehicles will be required to participate in periodic and random drug and alcohol testing by their employers in accordance with the Federal Department of Transportation regulations. Evidence of such participation shall be provided upon request.

Drug & Alcohol Testing Procedures

When required by this program, Parsons' employees and subcontractors will report to Well Now Urgent Care drug collection facilities. Well Now drug collection facilities are located at 961 Sheridan Drive, Buffalo (716.844.7100). Drug test results from non-Well Now drug collection facilities may be acceptable if collection and analysis of samples is otherwise equal to those outlined in this document. The Safety Director/Manager shall make the final determination if drug test results collected at non-Well Now facilities are acceptable.

After-Hours Testing (Post-Accident & Reasonable Suspicion)

Well Now Urgent Care provides post-accident testing. All post-accident testing is conducted at their Tonawanda clinic location. Health & Safety and the appropriate Talent Management/Human Resources representatives should be notified as soon as feasible following an employee being sent for testing. After hours testing of subcontractor personnel does not require notification of Parsons Talent Management/Human Resources. Well Now Urgent Care's address in Tonawanda is as follows:

1751 Sheridan Drive
Tonawanda, NY 14223
716.541.0234

Normal Business Hours: 8:00am – 8:00pm. 7 days a week

- Notify the PM, Health & Safety and the appropriate Talent Management/Human Resources representative as soon as feasible.
- For subcontractor personnel, notify Health & Safety as soon as feasible.

Confidentiality of Test Results

Test results will be maintained in accordance with applicable law in a confidential file of medical information. Subcontractors will be copied on drug and alcohol results for their personnel. The Safety Director/Manager will retain and secure subcontractor drug and alcohol test results as necessary to support a policy of prohibiting such individuals from being assigned to another project within the next year AND before a negative drug and alcohol test is provided.

Positive Test Results

A positive drug test result will be confirmed by a Medical Review Officer (MRO) responsible for reviewing test results and procedures. A positive alcohol test result will indicate blood-alcohol levels **greater than or equal to 0.04** and will also be confirmed with a second alcohol test and MRO review. Detectable alcohol **less than 0.04** will be considered a negative result and the individual will not be classified as intoxicated or otherwise under the influence. Individuals with blood-alcohol levels **less than 0.04** may be permitted to return to normal work duties including safety-sensitive activities. However, commercial drivers with blood alcohol between **0.04 and 0.02** must be removed from safety-sensitive activities that are specifically related to the operation of commercial vehicles for **24 hours** as required by Federal Department of Transportation (DOT) regulations. After 24 hours, normal driving duties may be resumed.

Any person who does not provide an acceptable urine sample after 3 hours or does not otherwise cooperate with testing procedures, will be classified as a refusal. Refusals will be treated as a positive result for purposes of follow-up and disciplinary action.

Testing positive or refusing a request for a drug and alcohol test may result in disciplinary action, up to being immediately removed from the project and not be permitted to work on another project for one year. A negative drug and alcohol test are also required prior to being reassigned to an project. The Safety Director will track drug and alcohol testing results.

4.12.2 On-Site Medical Services and Panel of Physicians

The Parsons Corporate Workers' Compensation Analyst establishes medical providers for the project and selects medical facilities to treat work-related injuries and illnesses, as follows:

Emergency Medical Services

- **Location**: Kenmore Mercy Hospital, 2950 Elmwood Avenue, Kenmore, NY 14217
- **Phone**: General Phone: 716.447.6100
- **Hours of Operation**: 24 hours
- **Directions**: See Exhibit 4-5

Non-Emergency Medical Services

- **Location**: Well Now Urgent Care, 1751 Sheridan Drive, Buffalo, NY 14223
- **Phone**: 716.844.710-8513
- **Directions:** See Exhibit 4-5.

WorkCare Information

- See Exhibit 4-6 for WorkCare forms

NOTE: Transportation to a medical facility for non-emergencies must be done by at least two (2) individuals (i.e., driver and observer).

4.12.3 Emergency Response

The project displays posters with emergency telephone numbers and locations of emergency facilities in visible locations and at selected phone locations throughout the project area (including subcontractor facilities). The following information is provided:

Emergency Contacts	Phone Number
Ambulance (Onondaga Fire Control)	**911**
Fire Department	**911**
State Police (NYS)	**911**
Parsons Contract Physician (WorkCare)	888.449.7787
Poison Control Center	800.252.5655
Well Now Urgent Care	716.844.7100

4.12.4 Workers' Compensation Program

The Corporate Risk Management Department establishes the workers' compensation carrier. If a workers' compensation loss occurs, the Corporate Workers' Compensation Analyst handles all communication with the workers' compensation carrier.

This project does NOT participate in an Owner's Controlled Insurance Program or project-specific insurance program. The workers' compensation policy covering Parsons Employees on this project is as follows:

AIG
15 Cornell Drive, 2nd Floor
Latham, NY 12110
877.640.2450
Policy Number: 0007169963

4.12.5 Medical Monitoring

Potential health hazards and potential exposures associated with these projects are zero to minimal and will not require medical monitoring. If new tasks are identified, health hazards and potential exposure will be re-evaluated and medical monitoring may be implemented, if warranted.

EXHIBIT 4-1
SITE-SPECIFIC PROJECT SAFETY PLAN ORIENTATION

Project Name: Tonawanda Coke Site 108

Project Location: 3800 River Road, Tonawanda, New York

Names of Personnel Responsible for Site Safety and Health:

- Program/Project Manager (PrM)- Tom Abrams (315) 741-3716 (cell)
- Program Safety Manager – Bill Moon (315) 323-8715 (cell)
- SSHO - TBD

Site specific safety plan orientation must be conducted with all new site workers prior to beginning any work. The orientation shall be conducted by any of the above-mentioned responsible personnel or their designees. Orientation shall consist of a review of the Parsons Safety Plan and site-specific AHAs.

Emergencies - Call 911 and/or your Supervisor for emergencies. In the event of an evacuation, the assembly points will be determined, located, and shown at the initial site task(s) Safety meeting, and again located and shown when the site tasks are to commence at other locations. Evacuation protocols and procedures will be discussed at these Safety meetings. The sound for an evacuation is three short fog horn blasts.

Incidents - Report all incidents that result in personal injury, property damage, or environmental release and near-miss incidents to your Supervisor and the SSO. Near-miss incidents COULD HAVE been an incident but did not because of a slight change in conditions or luck. However, they have the same causal factors as an incident, so it is just as important to investigate them for identifying solutions to prevent recurrence and share lessons learned. Both incidents and near misses will be reported according to both Honeywell and Parsons procedural protocol.

Workcare - Workcare will be utilized for Parsons Employees and provides 24-hour 7 day a week on-call medical professionals to answer any medical-related questions. These medical professionals also help provide injury assessment and guidance, treatment options, have access to advanced medical personnel, and will assist with suspected work-related injuries.

WORKCARE – 1 (888) 449-7787

Open Door - The management team is committed to an open-door policy and all will make themselves available to any team member at any time for any real or suspected Health, Safety or Environmental concern. Employees should attempt to utilize first line supervisors and the chain of command; however, employees are not prohibited from contacting any management team member should they believe concerns are not or will not be addressed and may do so without fear of retribution.

Communications - For Media Inquiries direct questions to Victoria Strietfeld (Honeywell) 973.455.5281.

Personal Protective Equipment (PPE)

Minimum PPE:

* Safety glasses with side shields (tinted safety glasses are not permitted during overcast weather, after sundown or inside buildings)
* Honeywell hard hat (hard hats do not have to be worn during routine site inspections on remediated sites with no construction activities taking place)
* Steel or composite toe work boots
* Long pants
* Minimum of short sleeve shirt (no tank tops or sleeves cut off)
* High visibility vest or T-shirt
* Hand protection (task specific – refer to appropriate AHAs)

Additional PPE requirements may include:

* Dust mask when the potential for elevated dust generation is a concern.
* Hearing protection – When working in an area where decibel level exceeds 85 for an 8-hour period.
* PFD (Personal Floatation Device) - To be implemented in areas with water greater than knee deep. When PFD is worn, all connections must be affixed.

Additional Site-Specific Health and Safety Hazards

Identify all activities on-site as being dangerous and having a possibility for an accident. Review with the worker the activities he/she is here to perform. Then, identify all possible hazards and safeguards for those activities. Next, have worker review all AHAs associated with those activities.

Physical Hazards

Slips trips and falls - Site conditions contain multiple walking hazards.

Manual Handling - Hazards presented by manual handling of material, tools or equipment. Individual lifting limits are capped at 50 lbs./person. For repetitive tasks, the NIOSH lifting equation is to be used. Employ the use of mechanical lifting devices or assistance when and wherever feasible.

BIOLOGICAL HAZARDS

Insects - Bees, ticks, mosquitoes, spiders and other insects may be encountered on-site. Notify your supervisor and any SHSO if you possess a known allergy and have been prescribed a personal emergency injection device. You will be required to carry with you any emergency allergic reaction mitigation devices while you will perform work on-site.

Plants - Poison ivy/sumac/oak may exist on-site in wooded areas.

Wildlife - Native wildlife may be encountered onsite such as raccoons, squirrels, opossums, snakes, rats, bats, frogs, mice, deer, coyote, fox, minx, rabbits, turkey, geese and birds, as well as other native species. Animal dens may present physical hazards.

Site Access Control –Personnel reporting to the site must park in the designated parking areas. Only vehicles approved by the SSO may enter the work zone. Site speed limits in any work zone will be set and discussed at the site(s) initial safety meetings.

Cell Phone Usage – Parsons' policy is no cell phone usage while operating a vehicle or equipment, this includes no hands-free devices.

Training – Site-specific training (PSHEP review and sign off). Copies of the PSHEP and SDS are available to all personnel. Daily safety meetings shall be documented and reviewed by all personnel working at the site. Prior to entering a work site, site workers must report to either the site PM/Field Team Leader/PrSM with valid documentation of the following:

* Negative drug test and alcohol documentation required annually and random for all personnel active on Honeywell projects

HAZCOM - General Hazard Communication training is provided by your employer. Specific chemicals have been previously covered in this orientation. Site Specific HAZCOM elements are listed below:

SDS Sheets - The SDS Master book is kept in the Team site vehicle. Any chemical brought onsite should be accompanied by the appropriate SDS sheet, sheets should be provided to safety prior to use so an evaluation on any new material can be conducted.

Appropriate PPE - PPE identified on an SDS must be used. If you are unaware of what PPE to use or need any specialized equipment, please inform your supervisor.

Specific Hazards in your Work Area - The sediment material is dynamic and nature with regard to hazards. Hazards specific to your work area will be communicated through your supervision, task specific AHAs, job safety analysis (JSA), and Take 5 Cards.

Gases, Vapors and Fumes - Gases, vapors and fumes may be released from a variety of processes, including:

- Using internal combustion engines
- Fueling vehicles or equipment

Mobile equipment – Use horns to alert others. Mirrors and back-up/travel alarm must be functional on all equipment and vehicles driving on-site. Use a spotter when backing vehicles with blind spots and/or around equipment (i.e., pipe lines, electrical boxes, etc.).

Work permits – It is not anticipated that tasks will require any additional permits. Permit requirements will be evaluated for any new tasks that are identified.

Decontamination - The SSO will determine the proper procedures for personal and equipment decontamination based on the work activities.

Proper Hygiene – Wash hands and face before eating, drinking, and smoking.

GENERAL SAFETY REQUIREMENTS, SITE SAFETY RULES

1. All site personnel must attend each shift's Daily Safety Meeting.
2. Report all incidents (any unplanned or unexpected event that results in personal injury, property damage or environmental release) and "near-miss reports" to your Supervisor or the SHSO. Near-miss incidents COULD HAVE been an incident but didn't because of a slight change in conditions or luck. However, they have the same causal factors as an incident, so it is just as important to investigate them for identifying solutions to prevent recurrence and share lessons learned.
3. Any individual taking prescribed or over the counter medication that may impair their ability work shall inform the site HSO. The HSO will review the matter with the appropriate personnel to determine if the employee can perform his/her work duties safely while taking the medication.
4. The personal protective equipment specified by the SHSO and in the HASP shall be worn by all site personnel. This includes Level D PPE which must be worn at all times in active work areas. Hardhats are not required for routine monitoring tasks in areas where not construction activities are taking place.
5. Respirators shall not be worn when conditions prevent a good face seal. Such conditions may be a growth of beard, sideburns, a skull cap that projects under the facepiece, or temple pieces on glasses. This regulation does not ban facial hair on respirator users, per se, from the workplace. However, when a respirator must be worn to protect employees from airborne contaminants, it has to fit correctly, and this will require the wearer's face to be clean-shaven where the respirator seals against it.
6. All personnel must sign the site log when entering and leaving the site property.
7. Personnel must follow proper decontamination procedures during and at the end of the work shift.
8. Eating, drinking, chewing tobacco or gum, smoking and any other practice that may increase the possibility of hand-to-mouth contact is prohibited in the Exclusion Zone (EZ) or the hot portion of the Contamination Reduction Zone (CRZ).
9. All signs and delineation shall be followed. Such signs and delineations shall not be removed except as authorized by the SHSO.
10. No one shall enter a permit required confined space without a permit, and Confined Space Entry Permits shall be implemented as issued.
11. All personnel must follow Hot Work Permits as issued.
12. All personnel must use the Buddy System in the Exclusion Zone.
13. All personnel must follow the work-rest regimens and other practices as required by the Heat Stress Program.

14. All personnel must follow lockout / tag-out procedures when working on equipment involving moving parts or hazardous energy sources.
15. No person shall operate equipment unless properly trained and authorized.
16. No one may enter an excavation greater than 4ft. deep unless authorized by the Competent Person.
17. Excavations must be sloped or shored properly. Safe means of access and egress from excavations must be maintained.
18. Ladders and scaffolds shall be solidly constructed, in good working condition and inspected prior to use. No one may use defective ladders or scaffolds.
19. Fall protection or fall arrest systems must be in place when working at elevations greater than 6 ft. from temporary working surfaces and more than 4 ft. from fixed platforms.
20. Safety harnesses and lanyards must be approved by the responsible party. The user must inspect the equipment prior to use. No defective personal fall protection equipment shall be used. Preloaded personal fall protection which has been involved in an incident must be recertified prior to re-use.
21. Hand and portable power tools must be inspected prior to use. Defective tools and equipment shall not be used.
22. Ground fault circuit interrupters (GFCI)s shall be used for cord and plug equipment used outdoors or in damp locations. Electrical cords shall be kept out of walkways and puddles unless protected and rated for the service.
23. Improper use, mishandling or tampering with health and safety equipment and samples is prohibited.
24. Horseplay of any kind is prohibited.
25. Possession or use of alcoholic beverages, controlled substances or firearms on any site is forbidden.
26. Use of cell-phones or personal electronic devices is prohibited while performing any work onsite, including the operation of any mobile equipment or motor vehicle.
27. All personnel shall be familiar with the Site Emergency Evacuation Procedures.

DISCIPLINARY PROCEDURES TO ENFORCE COMPLIANCE

General - All project personnel covered by this document are subject to disciplinary action, up to and including termination, for failure to comply with its applicable requirements. Management reserves the right to discharge or remove an employee from the project immediately for offenses that are grossly severe in nature. All project management personnel are responsible for enforcing safety requirements. Subcontractors must implement equivalent disciplinary action programs.

Non-compliance - For minor safety related infractions, as determined by project management personnel, such as failure to wear eye protection, personnel generally will be reminded of site policy verbally and given ample opportunity to comply or for retraining.

Documentation - More severe or repeat offenses may be reported immediately to an individual's supervisor, who will initiate disciplinary action in accordance with each company's policies. Subcontractors may receive notices of violation with additional requirements for compliance.

Continued Repeat Offense - Willful continued failure to comply will result in removal from the site permanently.

RIGHT TO ASK QUESTIONS, REPORT INFORMATION

Media and Local Questions asked of you - The proper response to all questions relating to the site or any work happening on-site is, "I'm not the right person to answer your question." Please refer any visitor to Parsons Site Management personnel.

Reporting and Questions from you - All site workers possess the right to ask questions of, and report information to Parsons.

EMPLOYEE USE OF MEDICATION

Prescription - Any individual taking prescription or over the counter medication which could cause adverse side effects while working, as indicated by their healthcare professional or medication warning label, shall inform the site SSO or Talent Management prior to using such medication. The SO will review the matter with the project Talent Management Lead to determine if the employee can perform his/her work duties safely while taking the medication. We reserve the right, if necessary, to have a 3rd party licensed healthcare professional determine if the use of the medication by the employee will affect the employee's work performance or the health & safety of others".*

* Craft union represented employees should refer to the project Labor Harmony Agreement for additional specific details on these requirements.

STOP WORK AUTHORITY

Right, Obligation and Responsibility - Stop Work Authority establishes the 'authority and obligation' of any individual to suspend a single work task or group operation when the control of HSE risk is not clearly established or understood. In general terms, the stop work authority process involves a stop, notify, correct and resume approach for the resolution of a perceived unsafe condition, act, error, omission, or lack of understanding that could result in an undesirable event.

EXHIBIT 4-2
INCIDENT REPORTING

Employees involved in or witnessing an incident or near-miss incident must immediately report it to the responsible SSO/Field Team Leader, who in turn immediately relays the report to the Parsons PM, and the appropriate subcontractor representatives, per Incident Reporting Requirements included in Attachment A. Near-miss incidents that could cause significant injury or loss of life must also be immediately reported in the same manner. No supervisor may decline to accept or relay a report of injury or significant near-miss incident from a subordinate. The PrSM will report near misses to Honeywell representatives, per Event Reporting Requirements in Appendix B.

Parsons requires that all incidents/accidents be reported within **four hours** to the Market SH&E Director (Jason Townsell Mobile (562) 565-3491] by the Parsons PrM, Tom Abrams (315) 552-9670; Mobile: (315) 263-5109 and PrSM Bill Moon (315) 323-8175. The Industrial Safety Manager is responsible for notifying the Corporate Workers' Compensation Analyst.

Parsons also requires that the PM and/or PrSM report an incident that results in a lost workday case or any fatality, injury of a private citizen, property loss, or damage in excess of $50,000, or catastrophes require **immediate** notification of the Market SH&E Director (Jason Townsell Mobile (562) 565-3491] The Industrial Safety Manager or Corporate Safety Manager must report any work-related fatalities within eight hours of the event and all work-related in-patient hospitalizations, as well as amputations and losses of an eye, to OSHA within 24 hours of the event.

Bill Moon, PrSM (315) 323-8175 (cell) is available for assistance in addressing documentation and notification. The PM or SSO (who has been trained on Parsons' reporting requirements and Online Safety Reporting System) then prepares and submits the incident information.

INCIDENT INVESTIGATIONS

All incidents and significant near-miss incidents are investigated by an individual or team with training in accident investigation and root cause analysis. Personal injuries involving medical treatment and incidents resulting in more than $1,000 damage will be verbally reported and submitted on the PWeb using the On-Line Safety Reporting System at https://pwebtools.parsons.com/safety/IncidentSelect.aspx within **4 hours**. Additionally, an Incident Investigation Report will be completed to identify root causes and corrective actions to prevent recurrence. Subcontractors must investigate incidents involving their employees or activities and submit an investigation report to the Parsons PM within **48 hours** of an incident. The Parsons Industrial Safety Manager will investigate or assign an investigator to each significant incident. The investigator will submit a final investigation report using the Online Safety Reporting System within **72 hours** of the incident. The PrSM maintains the investigation file. Instructions for entering incidents into the On-Line Safety Reporting System, Parsons Incident/Accident Report Form, Parsons Near Miss Report Form, and Parsons Wallet Card-Incident Reporting Guidelines are located in Attachment A of this report.

EXHIBIT 4-3
ORDER FOR WORK RELATED INJURY/ILLNESS EVAL/TREATMENT

_____ _____ of Parsons
(Employee Name) (Occupation)

is authorized to go to _____ for the following service(s):
(Name of Medical Provider)

Treatment for a Work-Related Injury/Illness for Date of Injury: _____.

In the event the above medical provider determines this injury or condition NOT TO BE WORK RELATED, the employee and Parsons understand that this employee may then be referred by the above medical provider to his/her personal medical doctor.

Employer Information:	Parsons 100 West Walnut Street Pasadena, CA 91124
Workers' compensation carrier:	AIG
Policy No.:	0007169963
Adjusting Office and Telephone No.:	15 Cornell Drive, 2nd Floor Latham, NY 12110 (877) 640-2450

Comments to Provider: Parsons attempts to provide any modified, alternate, light duty recommended._____

_____

_____ _____ _____
Authorized Employer Signature Print Name Date

_____ _____
Phone Number Fax Number

Disability slips and return-to-work notifications: Immediately fax to Parsons ***and*** provide copy to employee at conclusion of every evaluation/treatment.

Attention Emergency Department: After acute care, please refer patient back to a _____ for follow-up treatment.

(Medical provider—to be completed by Parsons—where permitted by law.)

EXHIBIT 4-4
PARSONS CORPORATION SUBSTANCE ABUSE POLICY

STATEMENT OF POLICY:

Parsons expects all employees to report to work in a fit condition in order to perform their duties at the utmost levels of safety and efficiency. To that end, Parsons expressly prohibits the unlawful manufacture, distribution, dispensing, possession, use, or sale of a controlled substance or alcohol on its premises at any time. Employees are prohibited from being at work under the influence of these substances. Parsons will reasonably accommodate the efforts of an employee to obtain medical treatment for substance abuse and to return to employment thereafter. However, no provisions of this policy will contravene the provision of the Employee Personal Conduct Policy or preclude the corporation from terminating an employee in accordance with this policy.

Parsons has an obligation to safeguard the privacy rights of all employees; however, it is also committed to provide a healthy and safe work environment for all employees and to take reasonable steps to safeguard the health and safety of others and protect the environment in conducting its business.

Safety and Environmental Provisions

In some instances employees may be required to undergo random toxicological tests to ensure their continuing fitness for duty to comply with contract mandated requirements or government regulations, or if performing work at locations where the nature of their duties is such that there is the potential for serious physical injury to themselves, to others, or the general public, or potential for significant damage to property or the environment.

Assignment of employees to such job sites will be done on a voluntary basis. Employees who refuse to participate in the random testing program and whose job duties would normally expose them to random testing will be considered for placement in other positions not requiring random testing. Every reasonable effort will be made to accommodate such transfers; however, if suitable work for which the employee is qualified is not available, the employee will be subject to termination. A positive test result will lead to immediate removal from the site, in addition to either corrective action in accordance with this policy or the employee's termination in accordance with the Employee Personal Conduct Policy.

Searches are another means of protecting the safety of individuals and property at those locations where the nature of the work has the potential for serious injury or damage. Reasonable searches may be conducted of individuals, their personal vehicles, effects, and other areas under the individual's control while at such work sites or engaged in Parsons business at such sites.

Employees will not be detained or searched without their consent. An employee's cooperation in a search at such work sites is a condition of employment. The employee will be required to sign an Acknowledgment and Consent for Random Toxicological Tests and Searches form. Such testing will be performed by the company using qualified contracted agents, or trained employees.

SUBSTANCE ABUSE TESTING - EMPLOYMENT OFFER

No candidate for employment will be subjected to substance abuse testing prior to the receipt of an offer of employment. Offers of employment, regardless of employment category, must contain a contingency regarding satisfactory completion of substance abuse testing. Failure to submit to or pass an examination will result in immediate disqualification from consideration for placement.

EMPLOYEE PERSONAL CONDUCT

All employees are expected to conduct themselves in a manner that ensures a positive, safe and efficient work environment while at Parsons. Improper conduct may be considered either a "General Offense" or a "Major Offense" and may result in disciplinary action, or in appropriate cases, termination. Termination is generally the result of the commission of a major offense, or where previous efforts to bring about correction have failed in terms of major or general offenses.

Employee Personal Conduct Policy

RESPONSIBILITIES:

The immediate supervisor monitors employee behavior and performance and is alert to problems arising from an employee's behavior or performance.

Human Resources ensures consistent and uniform application of this policy and, when required, interfaces with supervisor and employee to evaluate performance and behavior.

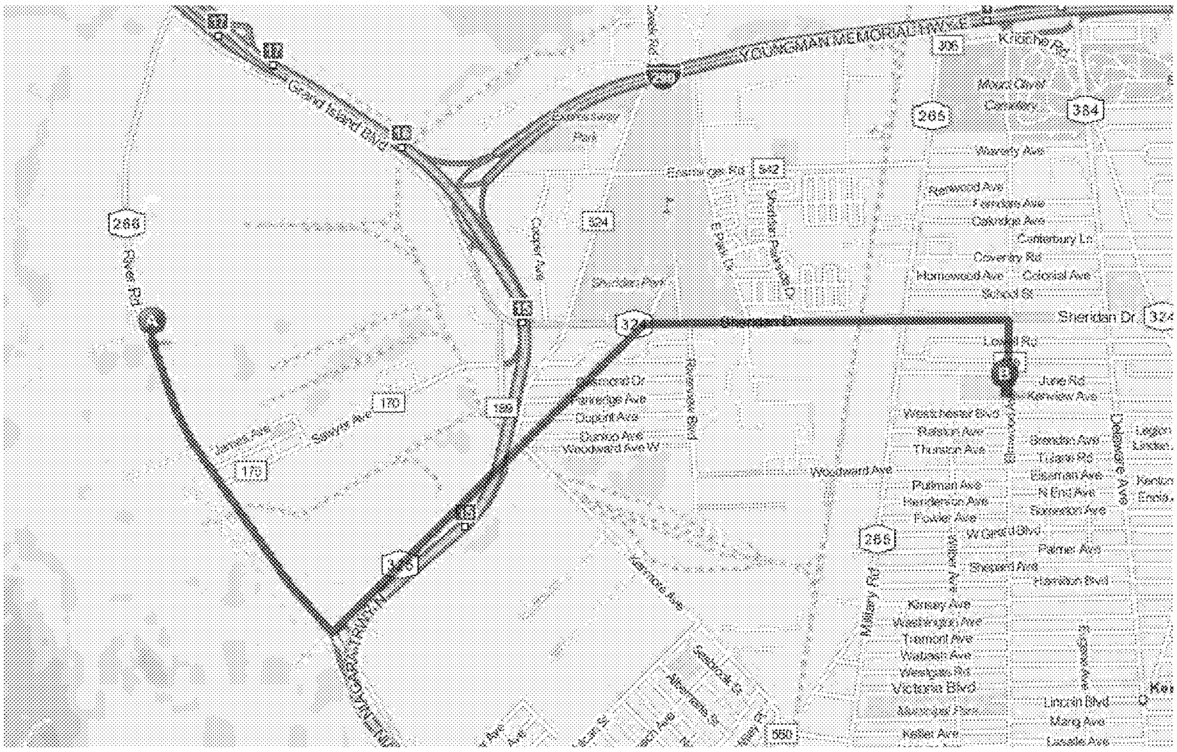
REFERENCES:

Employee Personal Conduct Policy

APPROVED: ***David R. Goodrich*** ***DATE:*** ***5/30/03***

EXHIBIT 4-5
ROUTE TO HOSPITAL

Kenmore Mercy Hospital
2950 Elmwood Ave
Kenmore, 14217
716-447-6100



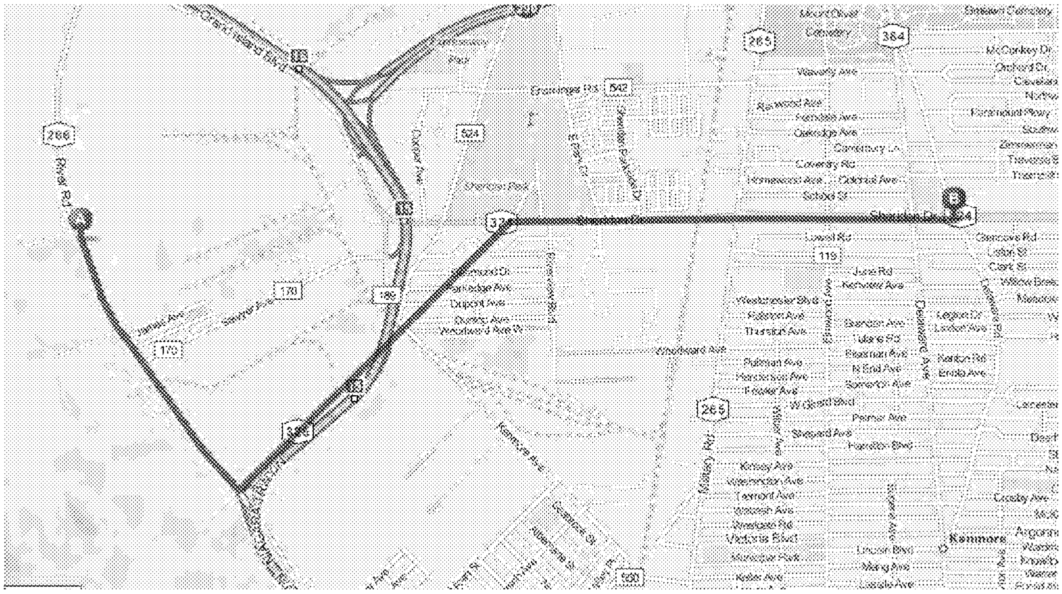
Directions to Kenmore Mercy Hospital

6 minutes/4 miles

1. *Start out going south on RIVER ROAD/NY-266 toward James Ave.*
2. *Turn left onto Sheridan Drive/NY-325*
3. *Turn slight right onto Grand Island Blvd/NY-324*
4. *Turn right onto Elmwood Ave/County Highway-119*
5. *2950 Elmwood is on the right*

NOTE: Transportation of an injured worker to a medical facility for non-emergency treatment must be done by at least two (2) individuals (i.e., driver and observer). If a driver is not available, then a cab service is acceptable as long as an observer is present.

Well Now Urgent Care
1751 Sheridan Dr
Buffalo, NY 14223
716-844-7100



Directions to Urgent Care
10 minutes/5.7 miles

1. *Start out going south on River Rd/NY-266 toward James Ave*
2. *Turn left onto Sheridan Dr/NY-325*
3. *Turn right onto Kenmore Ave/County Hwy-189*
4. *Turn slight right onto Dunston Ave*
5. *Enter next roundabout and take the 2nd exit onto Kenmore Ave/County Hwy-550.*
6. *Turn left onto Military Rd/NY-265*
7. *Turn right onto Sheridan Dr/NY-324*
8. *1751 SHERIDAN DR is on the right*

EXHIBIT 4-6
WORKCARE ASSESSMENT

Post-Injury Guidelines

If there is a Life-Threatening or significant medical event e.g. (not breathing, no heartbeat, unconscious, open wound, amputation, obviously broken arm or leg, etc.) then the first employee on the scene should:

1) Call for help
2) Call 911
3) Begin first aid/CPR if trained

Upon notification of a medical emergency the Field Team Leader will:

1) Make sure that 1st Aid/CPR trained employees are on scene and assisting the injured.
2) Make sure that any ancillary work ceases to make scene safe for responders.
3) Make sure that an employee is sent to the gate or entrance area to meet first responders and bring them to the injury scene.
4) Contact the Site Safety Officer.

Upon notification of a medical emergency the **Site Safety Officer** will:

1) Notify the Emergency Response Team if required.
2) Move to the injury scene with required first aid materials and direct the response.
3) Assist the first responders with any necessary decontamination or SDS' as needed.

If there is a non-life-threatening illness or injury event e.g. (stain or sprain, stiff back, minor laceration, sore muscle, bruised toe/finger, etc.) then the first employee on the scene should:

1) Call for help
2) Begin first aid if trained

Upon notification of a non-life-threatening illness or injury event the Field Team Leader will:

1) Make sure that 1st Aid/CPR trained employees are on scene and assisting the injured
2) Make sure that any ancillary work ceases to make scene safe for responders.
3) Contact the Site Safety Officer
4) Contact WorkCare and allow the injured employee to speak with a WorkCare doctor or nurse
5) Follow WorkCare guidelines; Drive the employee to the clinic if directed and stay with him/her until the visit is concluded
6) Provide the employee with "Questions to Consider Asking Your Doctor During a Clinic Visit"
7) Provide the employee with "Memo to Treating Medical Professional" prior to the employee going into the exam room.
8) Participate in the incident investigation process upon return to the site.

Upon notification of a medical emergency the **Site Safety Officer** will:

1) Notify the Shift Emergency Response Team Lead and the contractor CM/PM
2) Move to the injury scene with required first aid materials and direct the response
3) Assist the Field Team Leader in contacting WorkCare at (888) 449-7787

SECTION 5

PRE-CONSTRUCTION PHASE

5.1 RISK ANALYSIS AND SAFETY SPECIFICATION DEVELOPMENT

Procurement procedures require that a site-specific SH&E risk analysis be conducted before issuance of construction Request for Proposals (RFPs). Using the pre-bid risk analysis checklist, the PM leads this analysis to document existing exposures that may impact the work, surrounding facilities, equipment, workers, or the public at large. The analysis includes locating, documenting, and photographing items such as:

- Overhead and underground power lines
- Sewer and water utilities
- Traffic
- Security
- Fences
- Water hazards
- Existing geographical and environmental conditions
- Damage to ecological or cultural resources
- Risks due to buried items
- Other environmental regulatory requirements

Upon completion of the site risk analysis, high-risk activities are listed in the RFPs (as applicable), and bidders must describe controls and mitigation strategies to address these activities in their proposals. The RFP should note that the list is representative and that the selected contractor must identify and control all work-related hazards, worker exposures and potential environmental incidents. The standard safety specifications are given below.

- Preconstruction SH&E Meeting, Site Specific SH&E Review Checklist, and Project Technical and General Conditions Specification Review - Exhibit 5-1
- Pre-Field Work Safety Meeting Checklist - Exhibit 5-2
- Mobilization/Kick-Off Safety Meeting Checklist - Exhibit 5-3

5.2 PREBID MEETING

Pre-bid meetings are required to ensure that bidders understand the RFP. These meetings must include a discussion of safety, health and environmental performance expectations. During the pre-bid meeting, the PM can use the Preconstruction SH&E Meeting, Site Specific SH&E Review Checklist, and Project Technical and General Conditions Specification Review (3 Sheets) (Exhibit 5-1) to review the project SH&E philosophy, principles, and Parsons requirements with prospective bidders. Although this information is included in the RFP, the meeting reinforces the message.

5.3 SUBCONTRACTOR PREQUALIFICATION REVIEW

Project procurement procedures require that all subcontractors submit prequalification documentation for evaluation. The PM or PrSM conducts the safety prequalification evaluation in accordance with the online CSE system. Subcontractors are required to provide safety information to complete their CSE on an annual basis. The provided information is reviewed by a safety manager and the subcontractor receives a safety grade. A "C" or "D" grade may require additional mitigation measures to allow the subcontractor to work on-site.

5.4 PRE-CONSTRUCTION MEETING

The PM holds a pre-construction meeting before the subcontractor begins work. The meeting includes subcontractor representatives, the Parsons PM, the contract manager, and representatives from all construction disciplines, including safety. During the SH&E review, meeting participants review specific SH&E concerns, the pre-bid risk analysis, and competent person and site-specific SSHEP requirements. The PM provides the SH&E Point of Contact and emergency management information. The PM uses the Preconstruction SH&E Meeting, Site Specific SH&E Review Checklist, and Project Technical and General Conditions Specification Review (3 Sheets) (Exhibit 5-1) to document the meeting. *See ESHARP Guidebook, Volume 1 – Project, Section 6 for further detail.*

5.5 COMPETENT PERSON SUBMISSION REVIEW

Parsons and its subcontractors must identify the OSHA-regulated and certified competent persons for work or tasks that require this level of expertise. The supervisor of the competent person must certify the specific competencies of the named competent person in writing.

The supervisor and competent person sign and submit the Competent Person Form (Exhibit 9-1) to the Parsons PM. (Note click on this link for the Subcontractor Competent Person Form.

5.6 SUBCONTRACTOR SAFETY PLAN SUBMISSION REVIEW

5.6.1 Site-Specific Subcontractor Safety, Health, and Environmental Plans (SSHEP)

At least 10 days before work begins, each subcontractor must submit two copies of its SH&E program to the Parsons PM for review. The PM and PrSM review the plan to ensure that it meets Parsons' requirements.

If a contractor needs assistance developing a SSHEP, the PrSM can provide an electronic copy of a Model SSHEP (Appendix A2).

The subcontractor safety plan must address the following elements:

- Responsibilities
- SH&E compliance
- Communication
- Hazard Assessment
- Hazard Correction

- Risk of environmental incident
- Environmental controls
- Engineering controls
- Control measures to prevent environmental incident
- Incident investigation
- Training and instruction
- Recordkeeping
- The plan must include all applicable requirements of Parsons PSHEP, OSHA CFR 1910/1926 and applicable federal, regional, state, municipal, and/or local environmental regulation scope of work evaluation describing sequence of work and associated hazardous or environmentally risky activities
- AHA including evaluation of environmental risks
- Site employee SH&E orientation program to address location-specific issues
- Site-specific Emergency Action Plan that includes a list of key management personnel and contact information (home, office, project site, and cellular telephone numbers).
- Site-specific Medical Emergency Plan that lists qualified First Aid personnel by name and includes copies of their current certificates
- List of key line management personnel, by name and position, who will enforce the plan
- List of key competent or qualified personnel by name and copy of current documentation identifying specific certified competency (e.g., scaffolding, excavations, fall protection)
- A written progressive disciplinary program for violations of SH&E procedures
- Trenching and Shoring Plan (if applicable)
- 100% Fall Protection Plan (if applicable)
- Waste and hazardous material management (if applicable)
- Control measures for storm water and other wastewater discharges (if applicable)
- Identification of risks and control measures for activities that could involve environmental spills/releases
- Measures to address any other environmental regulatory requirements
- Contractor task hazard and risk planning
- Subcontractor weekly SH&E planning submission
- Contractor daily task SH&E planning

5.7 PRE-MOBILIZATION SH&E MEETING

Project Managers, or their designee, conduct the Premobilization SH&E Meeting on or before the first day of subcontractor mobilization in the field at the work site. *(See ESHARP Guidebook, Volume 1 - Project, Section 11 for additional details.)* Exhibit 5-2, Subcontractor Premobilization Safety Meeting, shows the checklist used for the SH&E portion of this meeting. The meeting includes a review of the pre-bid site/area risk analysis and a walk through of the work area to locate items on the Pre-Bid Risk Analysis Checklist.

EXHIBIT 5-1
PRECONSTRUCTION SH&E MEETING
SITE-SPECIFIC SH&E REVIEW CHECKLIST
PROJECT TECHNICAL AND GENERAL CONDITIONS SPECIFICATION REVIEW
(SHEET 1 OF 3)

Date:	
Subcontractor Representative:	
Phone:	
Project Location:	
Parsons Project Manager:	
Phone:	
Subcontractor Safety & Health Representative:	
Phone:	
Parsons Safety & Health Manager:	
Phone:	
Subcontractor Environmental Representative:	
Phone:	
Parsons Environmental Representative:	
Phone:	
This checklist supports the identification of work activities and programs in a preconstruction SH&E meeting. This list also includes items identified through the subcontractor review and high-risk activities identified through the project specification review. **High-risk activities (denoted with an asterisk) checked with a checkmark must be followed up during the construction phase with training, written plans and/or a specific Activity Hazard Analysis (AHA).** **This list should be reviewed with prospective bidders during the pre-bid meeting.** **NOTE: Use check box and add specifics and details as applicable (next to the callouts)**	
SAFETY & HEALTH	
☐	Site-Specific Safety, Health and Environmental Plans
☐	Competent/Qualified Person Documentation
☐	SH&E Audits/Inspections
☐	Subcontractor Responsibilities
☐	Site Orientation Requirements
☐	Preconstruction SH&E Meeting/Date
☐	Crane Inspection Certification
☐	Personal Protective Equipment (PPE) (Work activities or work site requires hearing protection/using respirators/special protective clothing/other)
☐	Public Exposure (Work activities or location requires special precautions to protect the public)
CONSTRUCTION SAFETY ISSUES	

EXHIBIT 5-1
PRECONSTRUCTION SH&E MEETING FORM
SITE-SPECIFIC SH&E REVIEW CHECKLIST
PROJECT TECHNICAL AND GENERAL CONDITIONS SPECIFICATION REVIEW
(SHEET 2 OF 3)

CONSTRUCTION SAFETY ISSUES (Contd.)	
☐	Steel Erection (SENRAC Requirements)
☐	Excavations/Trenching
☐	Powered Industrial Trucks, Fork Lifts
☐	Crane Work/Heavy Lifts, Rigging
☐	Work involving Hazardous Materials
☐	Electrical Tie-ins/Lockout – Tagout
☐	Aerial Lift Work – Scissor Lifts, Extendable Boom, etc.
☐	Underground, Caissons, Cofferdams
☐	Scaffold Erection/Work
☐	Demolition
☐	Marine Work/Live Boating
☐	Heavy Hauling
☐	Concrete
☐	Diving
☐	Work Adjacent to Production Areas
☐	Site Security/Visitor Control/Public Areas
☐	Process Safety Management
☐	Permits (Excavations, Scaffolding, Demolition, Traffic, Confined Space, Hot Work, Line Breaking, etc.)
☐	Confined Space (Confined space entry is required)
☐	Welding and cutting (Acetylene/gas cutting, arc welding, soldering and brazing)
☐	Ladders (Portable ladder use is required)
☐	Traffic Control (Work is on or near highways, roads, or mass transit)
MEDICAL	
☐	Substance Abuse Screening
☐	Emergency Procedures
☐	Site Security
☐	Smoking Policy
☐	Medical Services Requirements
☐	Treatment Locations, Addresses, and/or Phone List
ENVIRONMENTAL	
☐	Environmental Hazards
☐	Air Pollution/Emissions and required reporting
☐	Wastewater Discharges
☐	Drinking Water
☐	Management of Hazardous Materials and Hazardous and Solid Wastes
☐	Emergency Response to Spills and Releases Environmental Assessments
☐	Protected Ecological and Cultural Resources
☐	Specific Reports on Toxic or Hazardous Chemicals Usage and Storage (Required by Environmental Regulation)

EXHIBIT 5-1
PRECONSTRUCTION SH&E MEETING FORM
SITE-SPECIFIC SH&E REVIEW CHECKLIST
PROJECT TECHNICAL AND GENERAL CONDITIONS SPECIFICATION REVIEW
(SHEET 3 OF 3)

	ENVIRONMENTAL (Contd.)
☐	Materials to be Recycled
☐	Possibility of Buried Items Onsite (cultural artifacts, tanks, wastes, and ordinance) and what to do if encountered
☐	Environmental Regulatory Requirements
☐	Environmental Assets
☐	Resource Conservation/Sustainability
☐	Insects
☐	Plants
☐	Wildlife
☐	Medical Waste and Other Biohazards

Additional Notes/Comments:

ATTENDEES

Name	Title	Company

EXHIBIT 5-2
STANDARD PRE-FIELD WORK SAFETY MEETING CHECKLIST

Date:		Project/Location:	
Subcontractor Representative:		Parsons Project Manager:	
Phone:		Phone:	
Subcontractor Safety Rep:		Parsons Safety Manager:	
Phone:		Phone:	

The following items were identified and reviewed with the subcontractor.

Health & Safety		Medical	
Site-Specific Safety Plans/Model Program		Substance Abuse Screening	
Competent/Qualified Person Documentation		Emergency Procedures	
Safety Audits/Inspections		Site Security	
Subcontractor Responsibilities		Smoking Policy	
Site Orientation Requirements		Medical Services Requirements	
Mobilization/Kickoff Safety Meeting/Date		Treatment Locations/Addresses/Phone List	
Crane Inspection Certification		Other	
Personal Protective Equipment (PPE)			
Environmental Hazards			
Other			

Additional Notes/Comments:

EXHIBIT 5-3
MOBILIZATION/KICK-OFF SAFETY MEETING

PROJECT INFORMATION			
Project Name:		Meeting Date:	
Project Location:		Project Number:	
Scope of Work Covered In This Meeting			

MEETING ATTENDANCE			
Name (print)	Signature	Title or Project Role	Company

1. Honeywell Safety Vision – Review and reaffirm vision and beliefs as outlined in Section 1.0 of the HSP^2 program.
2. Project Safety Goals and Objectives
   - Total Incident Rate (TIR) target of _____
   - Lost Workday Incident Rate (LWIR) target of 0.0
3. Scope Of Work and Highly Hazardous Activities - Review key safety issues associated with highly hazardous activities.
   - Line breaking (process piping LOTO)
   - Work that may disrupt or damage existing piping, vents, drains (LOTO).
   - Any work on equipment that requires LOTO.
   - Major excavations (>5' deep or potential for damage to underground utilities)
   - Roof activities
   - Elevated work >6' that will not be done from manlifts or scaffolds
   - Hazardous painting or coating (epoxy paints, electro-static painting, cocooning, etc.)
   - Structural steel erection
   - Use of ladders above 24 feet.
   - Confined Space Entry (permit-required)
   - Any work within 20' of overhead power lines
   - Critical Crane Picks (>80% of rated capacity, multiple cranes on a single pick, near power lines, picks over occupied buildings, and picks of long-lead or specialized equipment.)
   - Other:
4. Honeywell Specification 01620 - Verify that copies were received by subcontractors and address any questions.
5. Incident Reporting Requirements
6. Drug & Alcohol Testing Requirements
7. Commitment to Light Duty work and the location of Industrial Medical Associates (IMA)
8. Safety Planning Requirements - Review the development and use of Project Safety, Health, and Environmental Plans (PSHEPs) and Job Safety Analyses (JSAs).
9. Safety Meetings - Review requirements related to daily safety meetings and Weekly Toolbox Safety Meetings. Review the use of daily Pre-Task Planners
10. Roles and Responsibilities
11. Other Site-Specific Safety Issues

SECTION 6

FIELD OPERATIONS

6.1 SITE RISK ANALYSIS

Before work begins, PMs lead a team that performs a risk analysis at each work site to identify hazards and risks that require specific control measures. During the weekly action item meeting, the project team discusses upcoming work tasks and associated risks and control measures. The weekly action item list generated during this meeting identify upcoming mobilization or demobilizations tasks, audits and inspections, competent person changes, training and new activities requiring an AHA. The project team and subcontractors also submit a Two-Week Look Ahead each week to identify upcoming tasks and assess if the new activities require a new or revised AHA.

As a part of the site risk analysis process, a risk register was developed, identifying potential hazards and evaluating the associated risks. This centralized, continually updated document also contains a list of controls to be implemented to reduce the risk of planned activities to an acceptable level. The project-specific risk register is included as Attachment G.

6.1.1 Chemical Hazards

Activities are being completed on sites where remedial construction activities have been completed or where contaminant concentrations are below remedial criteria. Risk of exposure to site workers is zero to minimal.

6.1.2 Physical Hazards

Physical hazards that may be encountered during the construction activities include, but are not limited to heat stress, cold-related illness, ultra-violet radiation, biological, and noise hazards.

Heat Induced Illness – Heat Stress:

The use of protective equipment may create heat stress. Monitoring of personnel wearing personal protective clothing should commence when the ambient temperature is 70 degrees Fahrenheit (°F) or above. Table 6.1 presents the suggested frequency for such monitoring. Table 6.2 presents the apparent temperature for given humidity and ambient temperature readings in shade. Monitoring frequency should increase as ambient temperature increases or as slow recovery rates are observed. Heat stress monitoring should be performed by a person with a current first aid certification who is trained to recognize heat stress symptoms. For monitoring the body's recuperative abilities to excess heat, one or more of the following techniques will be used. Other methods for determining heat stress monitoring, such as the wet bulb globe temperature Index from American Conference of Governmental Industrial Hygienist Threshold Limit Values Booklet can be used.

To monitor the worker, measure:

- Heart rate. Count the radial pulse during a 30-second period as early as possible in the rest period.

  - If the heart rate exceeds 100 beats per minute at the beginning of the rest period, shorten the next work cycle by one-third and keep the rest period the same.
  - If the heart rate still exceeds 100 beats per minute at the next rest period, shorten the following work cycle by one-third.
- Oral temperature. Use a clinical thermometer (3 minutes under the tongue) or similar device to measure the oral temperature at the end of the work period (before drinking).
  - If oral temperature exceeds 99.6°F (37.6 degrees Celsius (°C)), shorten the next work cycle by one-third without changing the rest period.
  - If oral temperature still exceeds 99.6°F (37.6°C) at the beginning of the next rest period, shorten the following cycle by one-third.
  - Do not permit a worker to wear a semi-permeable or impermeable garment when oral temperature exceeds 100.6°F (38.1°C).

Prevention of Heat Stress - Proper training and preventative measures will aid in averting loss of worker productivity and serious illness. Heat stress prevention is particularly important because once a person suffers from heat stroke or heat exhaustion, that person may be predisposed to additional heat related illness. To avoid heat stress the following steps should be taken:

- Adjust work schedules.
  - Modify work/rest schedules according to monitoring requirements.
  - Mandate work slowdowns as needed.
  - Perform work during cooler hours of the day, if possible, or at night if adequate lighting can be provided.
- Provide shelter (air-conditioned, if possible) or shaded areas to protect personnel during rest periods.
- Maintain worker's body fluids at normal levels. This is necessary to ensure that the cardiovascular system functions adequately. Daily fluid intake must approximately equal the amount of water lost in sweat, i.e., 8 fluid ounces (0.23 liters) of water must be ingested for approximately every 8 ounces (0.23 kilograms) of weight lost. The normal thirst mechanism is not sensitive enough to ensure that enough water will be ingested to replace lost sweat. When heavy sweating occurs, encourage the worker to drink more. The following strategies may be useful:
  - Maintain water temperature 50° to 60°F (10° to 16.6°C).
  - Provide small disposal cups that hold about four ounces (0.1 liter).
  - Have workers drink 16 ounces (0.5 liters) of fluid (preferably water) before beginning work.
  - Urge workers to drink a cup or two every 15 to 20 minutes, or at each monitoring break. A total of 1 to 1.6 gallons (4 to 6 liters) of fluid per day are recommended, but more may be necessary to maintain body weight.
- The best prevention method for heat induced illnesses is to train personnel to recognize the symptoms. Avoid extended site tours when temperature and relative humidity are

high. Perform site tour during cooler hours of the day if possible. Go to air-conditioned building or shaded area during periods of rest (field support trailer).

Cold-Related Illness:

If work on this project is conducted during the winter months, thermal injury due to cold exposure can become a problem for field personnel. Systemic cold exposure is referred to as hypothermia. Local cold exposure is generally called frostbite.

Hypothermia - Hypothermia is defined as a decrease in the patient core temperature below 96°F. The body temperature is normally maintained by a combination of central (brain and spinal cord) and peripheral (skin and muscle) activity. Interference with any of these mechanisms can result in hypothermia, even in the absence of what normally is considered a "cold" ambient temperature. Symptoms of hypothermia include: shivering, apathy, listlessness, sleepiness, and unconsciousness.

Frostbite - Frostbite is both a general and medical term given to areas of local cold injury. Unlike systemic hypothermia, frostbite rarely occurs unless the ambient temperatures are less than freezing and usually less than 20°F. Symptoms of frostbite are: a sudden blanching or whitening of the skin; the skin has a waxy or white appearance and is firm to the touch; tissues are cold, pale, and solid.

Working on Water in Cold Weather - If air temperature is below 50 deg F and water temperature is below 50 deg F, either Mustang suits, exposure suit, wet suit, or other type of survival suit is required for small craft (16 ft. and below) or craft with no side rails in lieu of PFDs.

Prevention of Cold-Related Illness - To prevent cold-related illness:

- Educate workers to recognize the symptoms of frostbite and hypothermia
- Identify and limit known risk factors
- Implement the requirement for wear of the full-body marine exposure suits for all Parsons and subcontractor personnel for on the lake boating operations during cold weather months
- Assure the availability of enclosed, heated environment on or adjacent to the site
- Assure the availability of dry changes of clothing
- Assure the availability of warm drinks
- Allow employees to take a warming break if they are shivering

Any person developing moderate hypothermia (a core temperature of 92°F) cannot return to work for 48 hours.

Ultraviolet Radiation:

The sun emits ultraviolet radiation (UV) as heat and light. The skin's natural defense mechanisms attempt to reject the UV by distributing melanin pigmentation where needed. However, overexposure to direct sunlight can cause inflammation or blistering of the skin (sunburn). The use of sunscreen, long sleeve shirts, and wide brim hats can help prevent sunburn.

Chronic exposure to UV radiation is known to cause skin cancer. In case of sunburn, do not apply burn ointment, cold cream, or butter to relieve pain. Use a dry dressing and get medical attention for severe, extensive sunburns. Also watch for dehydration. If a person is dehydrated, try and keep their fluid volume at their normal level.

Electrocution:

All heavy equipment will be kept a safe distance from live sources of electricity. All subsurface and overhead electrical sources and lines will be identified before ground disturbance activities commence. Where possible and/or practical, electric lines and sources will be deactivated or insulated before ground disturbance activities commence. Personnel should remain at a safe distance from equipment when not performing work to prevent the risk of injury from electrical arcing when high-voltage surges and spikes cause arcing in electronic circuits.

Ground fault circuit interrupters will be utilized on electrical equipment, where applicable, and extension cords will be inspected for splices, taps, and breaks in its outer cover insulation. If splices, taps, or breaks are noted on an extension cord, it shall not be used and it will either be removed from the site or cut up and rendered unusable.

Noise:

Noise is generated during construction activities in such operations as transportation of materials and operation of heavy construction equipment. Hearing protection will be worn by personnel to protection against the effects of hazardous noise exposure whenever sound-pressure levels exceed 85 dB(A) steady-state expressed as a time-weighted average. Personnel operating or working around heavy equipment should wear hearing protection.

Vehicle Traffic:

Vehicle traffic may include cars, trucks, and heavy equipment operated by contractors, subcontractors, or visitors to the site. Drivers should approach building corners with extreme caution as many of the buildings have blind corners making it extremely difficult to see intersection traffic. All heavy equipment should have a back-up alarm or drivers should honk to signal when they are backing up or when approaching blind corners. The speed limit at the site is 5 miles per hour on the causeway and 10 miles per hour everywhere else on-site.

Drivers are not permitted to use any communications device (e.g., cell phone) while driving. The driver and all passengers must use seatbelts in all moving vehicles at all times. A vehicle inspection of the tires, lights, horn, wipers, and backup alarm should be completed each day.

Project activities include installing road-side safety barriers along select public roadways. Road-side safety barrier work shall be completed by a New York Department of Transportation (NYSDOT) registered contractor. NYSDOT specified traffic control safety protocols will be implemented in association with all works performed within NYSDOT alignment property.

6.1.3 Biological Hazards

Biological hazards can result from encounters with mammals, insects, snakes, spiders, ticks, plants, parasites, and pathogens. Mammals can bite or scratch when cornered or surprised. The bite or scratch can result in local infection or infection with systemic pathogens or parasites. Insect and spider bites can result in severe allergic reactions in sensitive individuals. Exposure to poison

ivy, poison oak, or poison sumac results in skin rash. Ticks carry a number of serious diseases. Dead animals, organic wastes, and contaminated soil and water can harbor parasites and pathogens. Spent needles and/or syringes could be infected with potential blood or other infectious materials that could carry serious diseases.

Poison Ivy:

Some of the most common and severe allergic reactions result from contact with poison ivy, poison oak, or poison sumac. Contact with the poisonous sap of these plants produces a severe rash characterized by redness, blisters, swelling, and intense burning, and itching. The victim also may develop a high fever and may be very ill. Ordinarily, the rash begins within a few hours after exposure, but it may be delayed for 24 to 48 hours.

Ticks:

Ticks are common during the spring and summer throughout the work area when off any paved area. Two types of ticks may be encountered: the dog tick and the deer tick. The dog tick is the larger, more common tick. After biting, the dog tick will remain attached to the victim until engorged with blood. Dog ticks may transmit Rocky Mountain spotted fever and other diseases. The deer tick is much smaller, ranging from poppy seed to grape seed size, and does not remain attached to the skin for very long after biting. Deer ticks can transmit Lyme disease, which can have serious, long-term health effects if left untreated. Lyme disease is often characterized by a bulls-eye type rash; light in the center with an outer red area. Flu-like symptoms may also occur. These signs may occur at different times and the rash may not appear. If you discover any bites on the skin, wash the affected area and seek medical attention if a rash or flu-like symptoms appear.

Bees, Wasps, Hornets, and Other Insects:

Symptoms of an insect bite are normally a sharp, immediate pain in the body part bitten. Report any significant bite immediately. Poisonous insects and insect-like creatures that may be encountered around the work areas include the following:

- Bees (honeybees, bumble bees, sweat bees, wasps, and hornets)
- Caterpillars
- Beetles/Bugs
- Mosquitoes

Spiders:

The two poisonous spiders that may be encountered during the construction project are the Brown Recluse and the Black Widow. The Brown Recluse is up to one inch long with a violin or "fiddle" shaped mark on the top of the head. The Black Widow is a smaller, bulbous black spider with a red hourglass-shaped mark on the underside.

Reactions to a Brown Recluse spider bite include mild to severe pain within two to eight hours and a star shaped area around the bite within three to four days. Significant tissue death and loss accompanies a Brown Recluse spider bite. Reactions to a Black Widow spider include intense pain at the site of the bite after approximately 15 to 60 minutes, followed by profuse sweating, rigid

abdominal muscles, muscle spasms, breathing difficulty, slurred speech, poor coordination, dilated pupils, and generalized swelling of face and extremities.

Persons that have been bitten by a Brown Recluse or Black Widow spider should be immediately transported to a hospital. The spider should be collected (if possible) for confirmation of the species.

Personnel will be alert to the potential for spider bites. Spiders sometimes establish residence in stored clothing and PPE. It is advisable for personnel to inspect clothing and PPE for spiders prior to donning.

Blood Borne Pathogens:

Blood borne pathogens enter the human body and blood circulation system through punctures, cuts or abrasions of the skin or mucous membranes. They are not transmitted through ingestion (swallowing), through the lungs (breathing), or by contact with whole, healthy skin. However, under the principle of universal precautions, all blood should be considered infectious, and all skin and mucous membranes should be considered to have possible points of entry for pathogens. See Attachment F for further details regarding BBPs site requirements, exposure prevention, vaccination, exposure incident reporting, exposure incident response, training and documentation.

6.1.4 Environmental Hazards

Slip, Trip, and Fall Hazards:

The site may contain slip, trip, and fall hazards for site workers, such as:

- Wet and slippery surfaces
- Holes, pits, tree roots, or ditches
- Slippery surfaces
- Steep grades
- Uneven grades
- Sharp objects, such as nails, metal shards, needles and broken glass

Site inspections are required to be performed in the manner and frequency described in Section 4.6. The Exhibit 6-1 checklist can be used as site inspection form to document safe work areas and walkways and general housekeeping. This inspection can be used to identify hazards that can contribute to tripping hazards.

Thunderstorm Hazards:

During the course of field operations, severe weather may be encountered, including thunderstorms, lightning, rainstorms, and other unsafe weather conditions (i.e., high winds and tornadoes). Criteria indicating that severe weather conditions may exist include:

- High winds (greater than 40 miles per hour – depending on the tree cover and other site specific conditions)
- Tornado watch or warning in place for the area including the site
- Visible lightning

- Extreme temperatures (e.g., greater than 100 degrees F)
- Heavy rainfall that makes footing treacherous and visibility difficult

If severe weather is approaching, personnel will secure the location, secure the equipment, stop all work activities and go to a designated safe location. The SSO and CM will determine if weather conditions allow for restart of work activities. Monitor weather radio and if possible monitor weather radar via internet.

All water activities will cease during a thunder or lightning storm. All personnel must get off the water as quickly and safety as possible. All activities will cease for 30 minutes after the last thunder or lightening.

If weather conditions allow for restart of work activities, a visual inspection will be performed to check for damage or hazards caused by the storm. If damage is noted, activities will be evaluated and corrective actions to fix, repair or eliminate the hazard will be completed prior to start of any activities.

6.1.5 Fire Hazards

Although fires and explosions may arise spontaneously, they are more commonly the result of carelessness during the conduct of site activities, such as moving drums, mixing/bulking of site chemicals and during refueling of heavy or hand held equipment. Some potential causes of explosions and fires include:

- Mixing of incompatible chemicals, which cause reactions that spontaneously ignite due to the production of both flammable vapors and heat
- Ignition of explosive or flammable chemical gases or vapors by external ignition sources
- Ignition of materials due to oxygen enrichment
- Agitation of shock or friction-sensitive compounds
- Sudden release of materials under pressure

Working On or Near Water

During the course of the project a major amount of the work will be conducted on or around water. Any work conducted within 6 ft. of the water's edge will require workers to wear a Coast Guard approved PFD. Prior to commencement of any activities on the water, watercraft will be inspected, radio communication with shore personnel will be established, rescue procedures reviewed, and Coast Guard approved PFDs issued to workers. All equipment and operating personnel will meet or exceed U.S. Coast Guard requirements for safety. Prior to performing work on the water, a float plan and applicable AHAs will be completed and reviewed by boating personnel.

6.2 FIVE HAZARD CONTROL MEASURES – ORDER OF PRECEDENCE

Site SH&E hazards and risks are controlled using one or more of the control measures listed below in order of precedence:

- Engineer/design to eliminate or minimize hazards. A major component of the design phase is to select appropriate features to eliminate a hazard/risk and render it fail-safe or provide redundancy using backup components.
- Guard the hazard. Hazards that cannot be eliminated by design must be reduced to an acceptable risk level by guards or isolation devices that render them inactive.
- Provide warnings. Hazards or risks that cannot be totally eliminated by design or guarding are controlled through using a warning or alarm device.
- Provide special procedures or training. When design, guarding, or warnings cannot eliminate hazards/risks, subcontractors must develop procedures, training, and audits to ensure safe and environmentally compliant completion of work. Training cannot be a substitute for hazard elimination when life-threatening hazards are present.
- Provide PPE. To protect workers from injury, the last method in the order of precedence is the use of PPE, such as hard hats, gloves, eye protection, life jackets, and other protective equipment with the understanding that bulky, cumbersome, and heavy PPE is often discarded or not used, rendering this method ineffective without proper controls.

6.3 ACTIVITY HAZARDS ANALYSIS

Parsons and its subcontractors are required to conduct an AHA for all aspects of the work. An AHA includes the following steps:

- Identify the task and break it down into steps.
- Identify the hazards associated with each step.
- Identify the specific hazard control measure used for each step in accordance with the order-of-precedence method of control.

PMs can use the following list to determine the construction/operations AHAs for various high-hazard operations and critical tasks.

- Premobilization inspection. Conduct an initial site inspection for pre-job planning. The inspection should cover potential exposures such as the location of electrical lines, underground utilities, nearby structures, traffic conditions, site security needs, public exposures general liability, and other potential exposures. Environmental risks should be included in this inspection (e.g., potential for wastewater discharges, adequacy of planned storm water controls, planned hazardous materials/waste management, measures to prevent spills/releases).
- Water, wastewater, and marine work. Analyze work adjacent to, in, or over water (including lakes, canals, dams, treatment plants, water tanks, clarifiers, and reservoirs).
- Traffic controls. Internal traffic control plans should include ways to restrict the number of vehicles on-site, the flow of vehicles through the site, haul roads, speed controls,

subcontractor employee parking areas, merging of site traffic with local vehicle traffic, pedestrian controls in traffic zones, access by emergency vehicles and operator controls. Plan traffic controls for delivery of equipment or materials and equipment operations. Control measures include warning signs, flagmen, traffic stoppage and control, and unloading procedures.

- Material storage. Consider where materials and equipment will be stored on-site, and labeling and signage requirements. Implement measures to protect against vandalism and theft. Also consider the hazards that may exist for workers and the environment when storing or retrieving materials.
- Material handling. Consider the size and weight of loads, how equipment will be used, how equipment is set up and protected, and safety and maintenance inspections of material handling and rigging equipment. Consider to employee training in use of the equipment and ergonomic issues when engaged in manual material handling activities.
- Heavy equipment controls. Evaluate the use of heavy equipment in operations such as site clearing, grading, excavation, or lifting. Controls should include equipment alarms, use of qualified operators, pre-use inspections, and OSHA, regional, municipal, and local regulatory requirements.
- Fall protection. Use fall protection when employees are working above the normal work surface level. Consider how and where ladders, scaffolding, work platforms, or lifts (including scissors lifts or bucket lifts), roofing work, and leading edges are used. Evaluate protective measures such as Fall Protection Plans, use of personal fall arrest systems, and work surfaces for slip and fall hazards and protection.
- Consider operations where PPE is required and the type required, e.g., eye, head, foot, respiratory, hearing and hand protection, and types of special protective clothing.
- Portable hand and power tools. Evaluate tools to be used and the ways that workers can be protected from the hazards associated with their use. Consider tool maintenance requirements, electrical requirements, use of ground fault circuit interrupters, grounding, extension cords, tool inspection procedures, and employee training.
- Employee training. Review the safety training needs of employees. Training should include initial site SH&E orientations and hazard communication training. Some operations (e.g., excavation, blasting, scaffold erection, tunneling, confined space, heavy equipment operations, handling hazardous materials, storm water and waste water management, response to spills/releases, waste management, and hazardous plant process operations) may require special training that should be checked and evaluated.
- Mechanical, electrical, and piping. Evaluate all work associated with the installation, repair and maintenance of mechanical, piping and electrical work for interferences, lockout/tagout, line break procedures, and applicable customer requirements.

Exhibit 6-2 is an AHA Example. Exhibit 6-3 contains the AHA Template.

6.4 OM&M SITE INSPECTION

As discussed in Section 4.6, the PM, or their designee conducts weekly site inspections. Additional inspections will also be completed when a significant task is being performed (e.g.,

soil/sediment sample collection, sample surface water collection, major restoration efforts by subcontractor, etc. If the PM is not on-site, the most senior person on-site will conduct the inspection. An example site inspection checklist is provided as Exhibit 6-1. Site inspections are a protocol designed to identify and correct unsafe acts or conditions in the scope of work conducted by either Parsons or any subcontractor. The PrSM maintains the original audit documentation on file and forwards results of the audit to the SH&E Manager.

6.5 SH&E ENFORCEMENT

Parsons and its subcontractors enforce all applicable SH&E requirements of regional, federal, municipal, state, local and all other regulation; where applicable by OSHA 1910 and 1926 and Engineering Manual EM 381.1, where applicable. In addition, subcontractors must comply with and enforce Parsons' site requirements.

Parsons and its subcontractors have written progressive disciplinary systems available for review in their Human Resources departments.

6.6 NOTICE OF VIOLATION OF SAFETY AND HEALTH REGULATIONS

The project has a formal notice of Subcontractor Violation of SH&E Regulations Program (Exhibit 6-4) to ensure that violations are issued as the result of an immediately dangerous to life and health situation, respiratory airborne hazards), and/or when the subcontractor repeatedly fails to comply with SH&E requirements. The Notice of Subcontractors Noncompliance to SH&E Regulations (Exhibit 6-5) documents poor performance and requires a response from subcontractor senior management. The notice contains five distinct levels of discipline, from submission of a recovery plan to contract termination.

6.7 COMPETENT FIRST AID PERSON

At least one competent person must be available at the work site at all times to render first aid. This person must have a valid certificate in first aid training from the United States Bureau of Mines, the Red Cross/Crescent, or equivalent and verifiable regional, municipal, or local training programs. First aid supplies must be accessible for immediate use and in sufficient quantity to handle common first aid incidents.

The response time and distance to the nearest clinic, hospital, or physician identified in Section 4.11.3 has been determined to be 10 minutes. Based on the activities provided in the SOW (Section 2.1) and the list of AHA included in Section 6.3, the project has the potential to have an accident involving suffocation, severe bleeding, or other life threatening or permanently disabling injury or illness. Due to the aforementioned potential hazards and to meet this requirement, the project will require at least one individual on-site to be CPR/first aid trained. This person can be the SSO for the site provided that the field team informs the SSO where they will be working onsite and when they enter and leave the site. Copies of valid training certificates will be retained by the SSO prior to starting work. The employee(s) listed below are assigned to the project on a full-time basis and will have a valid certificate in first aid, CPR/AED, and blood-borne pathogens:

Name	Job Title	First Aid	CPR/AED	Blood-borne Pathogens
Bill Moon	PrSM	1/16/21	1/16/21	-
TBD				
				-

6.8 COMMUNITY AIR MONITORING PLAN

A community air monitoring program is to be determined for this project.

TABLE 6.1

SUGGESTED FREQUENCY OF PHYSIOLOGICAL MONITORING FOR FIT AND ACCLIMATED WORKERS

ADJUSTED TEMPERATURE[b]	NORMAL WORK ENSEMBLE[c]	IMPERMEABLE ENSEMBLE
90°F (32.2°C) or above	After each 45 minutes of work	After each 15 minutes of work
87.5°-90°F (30.8°-32.2°C)	After each 60 minutes of work	After each 30 minutes of work
82.5°-87.5°F (28.1°-28.1°C)	After each 90 minutes of work	After each 60 minutes of work
77.5°-82.5°F (25.3°-28.1°C)	After each 120 minutes of work	After each 90 minutes of work
72.5°-77.5°F (22.5°-25.3°C)	After each 150 minutes of work	After each 120 minutes of work

[a] For work levels of 250 kilocalories/hour.

[b] Calculate the adjusted air temperature (T adj) by using this equation: T adj °F = T °F + (13 x % sunshine). Measure air temperature (T) with a standard mercury-in-glass thermometer, with the bulb shielded from radiant heat. Estimate percent sunshine by judging what percent time the sun is not covered by clouds that are thick enough to produce a shadow. (100% sunshine = no cloud cover and a sharp, distinct shadow; 0% sunshine = no shadows.), or use Figure A-9.1 Heat Index, or Figure A-9.2 Heat Stress Calculator.

[c] A normal work ensemble consists of cotton coveralls or other cotton clothing with long sleeves and pants.

TABLE 6.2

HEAT INDEX

	ENVIRONMENTAL TERMPERATURE (Fahrenheit)										
	70	**75**	**80**	**85**	**90**	**95**	**100**	**105**	**110**	**115**	**120**
RELATIVE HUMIDITY											
0%	64	69	73	78	83	87	91	95	99	103	107
10%	65	70	75	80	85	90	95	100	105	111	116
20%	66	72	77	82	87	93	99	105	112	120	**130**
30%	67	73	78	84	90	96	104	113	123	**135**	**148**
40%	68	74	79	86	93	101	110	123	**137**	**151**	
50%	69	75	81	88	96	107	120	**135**	**150**		
60%	70	76	82	90	100	114	**132**	**149**			
70%	70	77	85	93	106	124	**144**				
80%	71	78	86	97	113	**136**					
90%	71	79	88	102	122						
100%	72	80	91	108							

*Combined Index of Heat and Humidity...what it "feels like" to the body
Source: National Oceanic and Atmospheric Administration

How to use Heat Index:

1. Across top locate Environmental Temperature
2. Down left side locate Relative Humidity
3. Follow across and down to find Apparent Temperature
4. Determine Heat Stress Risk on chart at right

Note: Exposure to full sunshine can increase Heat Index values by up to 1 degrees

Apparent Temperature	Heat Stress Risk with Physical Activity and/or Prolonged Exposure
90-105	Heat Cramps or Heat Exhaustion Possible
105-130	Heat Cramps or Heat Exhaustion Likely, Heat Stroke Possible
>130	Heat Stroke Highly Likely

EXHIBIT 6-1
SH&E Inspection Checklist (Sheet 1 of 2)

Project Name:	Date/Time:
Project Number:	Signature:
Observation Details – Provide a description of the task observed including items such as: titles and company of observees, work activities, site/traffic conditions and weather as well as general positive comments observed during the observation.	
Check the appropriate box during your inspection or indicate N/A. Add observations in the comments section for Safe and At-Risk items. At-Risk items must have a comment to describe what was observed.	

1 - Observation - PPE	Safe	At Risk	Comments
1. Fall protection utilized per AHA requirements			
2. Hearing protection worn per AHA requirements			
3. Hand protection worn per AHA requirements			
4. Eye/Face protection worn per AHA requirements			
5. Foot protection worn per AHA requirements			
6. Respiratory protection worn per AHA requirements			
7. Head protection worn per AHA requirements			
8. Reflective vest, clothing etc. worn per AHA requirements			
9. PPE inspected and in good condition			
2 - Observation – Body Use and Positioning	**Safe**	**At Risk**	**Comments**
10. Uses proper Lifting/Carrying/Pushing Safety in Motion Techniques			
11. Faces machine or ladder and maintains 3 point contact when mounting and dismounting			
12. Keeping hand and body parts away from pinch points			
13. Body parts and body out of line of fire			
3 - Observation – Work Environment	**Safe**	**At Risk**	**Comments**
14. Work areas and pathways clear of slip and trip hazards; uneven surfaces addressed			
15. Site free from obstructions and housekeeping maintained			

Exhibit 6-1
SH&E Inspection Checklist (Sheet 2 of 2)

16. Work zone defined and/or secured			
17. Maintains adequate lighting and illumination			
18. Wastes properly stored, secured and disposed of			
19. Decontamination techniques performed per AHA and task requirements			
4 - Observation – Operating Procedures	**Safe**	**At Risk**	**Comments**
20. Take 5/Job Plan/Pre Job Inspection Performed			
21. Held and documented toolbox safety meeting			
22. Reviewed, modified as needed and signed AHA			
23. Permits complete and present at job site			
24. Interfaces with other personnel effectively			
25. Identified and documented subsurface structures and utilities using Pre Drill/Subsurface Checklist			
Observation – Tools and Equipment	**Safe**	**At Risk**	**Comments**
26. Inspects tools and equipment			
27. Chose the right tool for the job			
28. Uses tools only for their intended purpose			
29. Air monitoring equipment is in use and calibrated			
30. Vehicle and equipment parked to allow for first move forward/backed in when possible/chocks in use/**GOAL** performed/Parking Brake set			

Corrective Actions and Root Cause Analysis				
Root Cause	1.	Lack of skill or knowledge	5.	Lack of or inadequate procedures
	2.	Done it that way before and no incident occurred	6.	Inadequate communication of expectations
	3.	Supervisor allowed questionable behavior to occur	7.	Inadequate tools or equipment
	4.	Following JSA takes more time or effort		

At Risk Items (IndSafe Problem Description)	**Root Cause Number (IndSafe Comments)**	**Solution (IndSafe Recommendation)**	**Responsible Party**	**Target Completion Date**	**Actual Completion Date**

EXHIBIT 6-2
COMPLETED ACTIVITY HAZARDS ANALYSIS EXAMPLE
PAGE 1 OF 3

Activity/Work Task: Entering Excavation	Overall Risk Assessment Code (RAC) (Use highest code)					**M**
Project Location:	**Risk Assessment Code (RAC) Matrix**					
Contract Number:	**Severity**	**Probability**				
Date Prepared (MM/DD/YY):		Frequent	Likely	Occasional	Seldom	Unlikely
Prepared by (Name/Title):	Catastrophic	E	E	H	H	M
	Critical	E	H	H	M	L
Reviewed by (Name/Title):	Marginal		M	M	L	L
Employer / BU: Parsons	Negligible	M	L	L	L	L

Notes: (Field Notes, Review Comments, etc.)
References:

Step 1: Review each "Hazard" with identified safety "Controls" and determine RAC (See above).
The RAC is developed after correctly identifying all of the hazards and fully implementing all controls.

"Probability" is the likelihood to cause an incident, near miss, or accident and identified as: Frequent, Likely, Occasional, Seldom or Unlikely.

"Severity" is the outcome/degree if an incident, near miss, or accident did occur and identified as: Catastrophic, Critical, Marginal, or Negligible

Step 2: Identify the RAC (Probability/Severity) as E, H, M, or L for each "Hazard" on AHA. Annotate the overall highest RAC at the top of AHA.

RAC Chart

E = Extremely High Risk
H = High Risk
M = Moderate Risk
L = Low Risk

Job Steps	Hazards	Controls	P	S	RAC
1. Arrival, passing near, and/or around the excavation	1.1 Absence of edge protection and warning signs.	1.1.1 Maintain a safe distance away from the edge of the excavation. 1.1.2 Ensure that the edge protection and warning will be immediately provided. 1.1.3 Ensure gangways are provided across trenches to eliminate jumping over the trench.	S	Cr	M
	1.2 Presence of tension cracks near the edge of the excavation and evidence of soil collapse.	1.2.1 Maintain a safe distance away from the edge on the excavation. 1.2.2 Ensure that no materials are placed on the excavation edge. 1.2.3 Follow warning signs onsite.	S	Cr	M

EXHIBIT 6-2
COMPLETED ACTIVITY HAZARDS ANALYSIS EXAMPLE
PAGE 2 OF 3

Activity/Work Task: Entering Excavation		Overall Risk Assessment Code (RAC) (Use highest code)			M
Project Location:		Risk Assessment Code (RAC) Matrix			
Job Steps (Cont'd)	**Hazards**	**Controls**	**P**	**S**	**RAC**
2. Entering the excavation	2.1 Access and Egress – Unsafe Ramp.	2.1.1 Look ahead and be aware of moving plant and vehicles. 2.1.2 Keep the hands free (not in the pocket) while walking 2.1.3 Avoid slippery surfaces (oil, water mud, stones, etc.) 2.1.4 Ensure that ramp/walkway is adequately illuminated. 2.1.5 Keep scanning the floor; avoid obstacles, such as building material, cables, and tools.	S	M	L
	2.2 Access and egress – Unsafe Ladder.	2.2.1 Ensure that the top and bottom ends of the ladder are secure. 2.2.2 Make a visual inspection to ensure that the ladder is safe and sound. 2.2.3 Ensure that the ladder will extend one meter clearance on top. 2.2.4 Ensure that ladder is free from oil, grease, or mud. 2.2.5 Maintain three-point contact. 2.2.6 Check for proper angle of the ladder (4:1). 2.2.7 Do not use job made ladder unless certified. 2.2.8 Do not carry a load on a ladder. 2.2.9 Only one person at a time will use a ladder. 2.2.10 Ensure that adequately illumination is provided onsite.	S	Cr	M
	2.3 Access and egress – Unsafe Stairs.	2.3.1 Check for the proper angle of the stairs. 2.3.2 Check if the tread is anti slip. 2.3.3 Ensure that railing is in good condition. 2.3.4 Maintain 3-point contact. 2.3.5 Ensure that stairs treads is free from oil, grease or mud. 2.3.6 Ensure that adequately illumination is provided on site. 2.3.7 Ensure all stairs of 4 or more risers have a hand rail.	S	Cr	M
	2.4 Access and egress - Unsafe man basket.	2.4.1 Ensure third party certification of the man basket and crane. 2.4.2 Perform a pre-use inspection on the man basket to ensure that it is in good condition 2.4.3 Check for the safe working load (SWL) of the man basket. 2.4.4 Check for the full body harness and adequate anchor point 2.4.5 Ensure that the crane operator and rigger are all certified.	S	Cr	M

EXHIBIT 6-2
COMPLETED ACTIVITY HAZARDS ANALYSIS EXAMPLE
PAGE 3 OF 3

Activity/Work Task: Entering Excavation			Overall Risk Assessment Code (RAC) (Use highest code)		M
Project Location:			Risk Assessment Code (RAC) Matrix		
Job Steps (Cont'd)	**Hazards**	**Controls**	**P**	**S**	**RAC**
3. Walking inside the excavation	3.1 Falling Materials	3.1.1 Ensure that materials are not placed on the edge. 3.1.2 Follow all mandatory signs and out of bound areas 3.1.3 Ensure that basic PPE is worn (hard hat, safety glass, safety shoes). 3.1.4 Ensure no overhanging or undermined sides.	S	M	L
	3.2 Falls on same level	3.2.1 Use designated route and walkway. 3.2.2 Look ahead and be aware. 3.2.3 Keep hands free (not in pocket) while walking onsite. 3.2.4 Follow mandatory signs onsite.	S	M	L
	3.3 Signs of cracks or collapse on the sides of the excavation	3.3.1 Work should be stopped and adequate support system shall be installed to prevent cave-ins.	S	Cr	M
4. Walking on elevated areas of the excavation	4.1 Falls from Height	4.1.1 Ensure that edge protection is in place. 4.1.2 Follow mandatory warning signs onsite. 4.1.3 Do not approach near unprotected edges. 4.1.4 Use designated routes and walkways. 4.1.5 Do not stop on and/or over covered voids, where possible.	S	Cr	M
5. Passing a noisy area in the excavation	5.1 Noise	5.1.1 Check if the contractor has conducted noise survey. 5.1.2 Follow mandatory use of PPE.	S	M	L
6. Passing near Moving Equipment and Vehicles on or near the excavation	6.1 Moving Equipment and Vehicles	6.1.1 Wear high-visibility vest. 6.1.2 Use designated walkways. 6.1.3 Do not pass behind moving equipment and vehicles.	S	Cr	M
7. Passing live utilities	7.1 Live Utilities	7.1.1 Coordinate with the contractor regarding presence of any live utilities. If so, ensure that control measures are provided. 7.1.2 Follow mandatory signs and out of bound areas.	S	Cr	M
8. Passing flooded areas	8.1 Flooding and presence of water in the excavation/trench	8.1.1 Check for the weather condition before entering the excavation. Exit if heavy rain starts. 8.1.2 Ensure water intrusion is controlled by dewatering	S	M	L

EXHIBIT 6-3 ACTIVITY HAZARDS ANALYSIS TEMPLATE
PAGE 1 OF 2

Activity/Work Task:	Overall Risk Assessment Code (RAC) (Use highest code)					
Project Location:	**Risk Assessment Code (RAC) Matrix**					
Contract Number:	**Severity**	**Probability**				
Date Prepared (MM/DD/YY):		Frequent	Likely	Occasional	Seldom	Unlikely
Prepared by (Name/Title):	Catastrophic	E	E	H	H	M
	Critical	E	H	H	M	L
Reviewed by (Name/Title):	Marginal		M	M	L	L
Employer / BU: Parsons	Negligible	M	L	L	L	L

Notes: (Field Notes, Review Comments, etc.)
References:

Step 1: Review each "Hazard" with identified safety "Controls" and determine RAC (See above).
The RAC is developed after correctly identifying all of the hazards and fully implementing all controls.

"Probability" is the likelihood to cause an incident, near miss, or accident and identified as: Frequent, Likely, Occasional, Seldom or Unlikely.

"Severity" is the outcome/degree if an incident, near miss, or accident did occur and identified as: Catastrophic, Critical, Marginal, or Negligible

Step 2: Identify the RAC (Probability/Severity) as E, H, M, or L for each "Hazard" on AHA. Annotate the overall highest RAC at the top of AHA.

RAC Chart

E = Extremely High Risk
H = High Risk
M = Moderate Risk
L = Low Risk

Job Steps	Hazards	Controls	P	S	RAC

EXHIBIT 6-3 ACTIVITY HAZARDS ANALYSIS TEMPLATE
PAGE 2 OF 2

Activity/Work Task: Entering Excavation		Overall Risk Assessment Code (RAC) (Use highest code)			
Project Location:		Risk Assessment Code (RAC) Matrix			
Job Steps (Cont'd)	Hazards	Controls	P	S	RAC

Equipment to be Used	Training Requirements/Competent or Qualified Personnel name(s)	Inspection Requirements

EXHIBIT 6-4
NOTICE OF SUBCONTRACTOR VIOLATION OF SH&E REGULATIONS

Date:		
Contractor Name:		
Address:		
Attention:		

This letter officially notifies you that you have been found to be in violation of the following Safety, Health, and Environmental Regulations: _____
on (date) _____, by _____

Confined Space Entry	☐	Lockout/Tagout	☐	Hot Work	☐	Personal protective equipment
Knowledge of environmental requirements	☐	Awareness of warning alarms	☐	Evacuation routes	☐	Backup alarms
Assembly locations	☐	Fall Protection	☐	Scaffolding	☐	Environmental/hazardous material storage
Trenching	☐	Safe Work Practices	☐	Security Practices	☐	Spill to the environment
Waste storage or disposal	☐	Wastewater discharge	☐	Buried items	☐	Violation of environmental regulation

Other: _____
_

Environmental:

This/These violations occurred at the following locations: _____

At the following times and dates:

The name of the employee(s) was (were):

Pweb link: Notice of Subcontractor Violation

EXHIBIT 6-5
NOTICE OF NONCOMPLIANCE WITH SH&E REGULATIONS

Under conditions of this enforcement procedure check all items that apply:

☐	1.	You are being notified of this violation and should take corrective action to prevent a reoccurrence. The corrective action shall be documented to the Parsons Construction Management representative immediately.
☐	2.	You must submit a plan for compliance to your Parsons Construction Management representative and the Construction Safety Manager within two days of receipt of this letter. The compliance plan must include the means or methods of compliance and the date that the requirements for compliance will be completed. Once compliance has been achieved, a follow up letter must be sent to the Parsons Construction Management representative and Construction Safety Manager. Failure to comply will result in disciplinary action against your Company.
☐	3.	You are required to review the stated procedures with your Parsons Construction Management representative. Work may not commence on the site until the review is complete and the Subcontractor responds formally that the procedure is understood and will comply.
☐	4.	You are required to review the stated procedures with your Parsons Construction Management representative. Work may not commence on the site until the review is complete and you **must** confirm formally the disciplinary action to be taken against the supervisor and employees.
☐	5.	All work on the site will stop until the Parsons Construction Management representative reviews all the facts with the Subcontractor and determines if the contract between the parties will be terminated.

Sincerely,

Parsons Representative

cc:
Issuing Construction Manager Representative
Job File
BU Safety Director
PM

Pweb link: Notice of Subcontractor Noncompliance

SECTION 7

SAFETY TRAINING

7.1 PROJECT SAFETY ORIENTATION

The Parsons PM, Project Engineer, or SSO conducts the site-specific orientation for all new Parsons' staff and subcontractor management personnel.

The Orientation takes approximately two hours to complete and includes applicable owner, Parsons, and regulatory reference material, including:

- Owner – SH&E requirements
  - Applicable regional, municipal, and local regulations and if applicable and in the United States or its territories OSHA 1910 General Industry and 1926 Construction Regulations and
- Parsons applicable requirements, including items covered in Section 4.2
- Subcontractor requirements

All visitors must receive a brief orientation as described in Section 4.2, and be escorted by the PM, Project Engineer, SSO, or a designee familiar with the potential hazards on the project.

Subcontractors must conduct similar orientations for their staff and craft employees and must document all orientations using the Subcontractor Employee Training Acknowledgement Form (Exhibit 7-1) and Subcontractor Competent Persons Form (Exhibit 7-2). The project Talent Manager maintains orientation documents and acknowledgement forms.

7.2 ZERO INCIDENT TECHNIQUES / START TRAINING

Consistent with Parsons corporate initiatives in safety, all managers and supervisors, including subcontractor personnel, must complete START training. Records of training completion are maintained by the SSO and forwarded to the Market SH&E Director.

7.3 DAILY TOOLBOX SH&E MEETINGS

Parsons and its subcontractors conduct toolbox safety meetings at the beginning of day when field work is occurring. These meetings include topics relevant to upcoming work, review of applicable AHAs, remind employees of SH&E work procedures established for the tasks, and may include reviews of recent incidents. The toolbox training content and attendance is documented and retained (Exhibit 7.3). Supervisors should always ask whether any workers have questions before they are released for work

7.4 ACTIVITY HAZARD ANALYSIS TRAINING

When the activity hazards analysis is complete, the Parsons supervisor or subcontractor conducts a training session with all employees involved with the analyzed task. The training may be informal and at the site where the task is performed. Employees should be given an opportunity to provide input regarding task steps, hazards identified, and appropriate control measures.

7.5 REGULATORY TRAINING PROGRAMS

Regional, municipal, local, and OSHA regulations require specific training in certain circumstances. Based on the SOW and meetings with regulatory officials, the following training topics are provided on the project:

- Hazard Communication – as per 29 CFR 1910.1200
- CPR/AED/First aid – provided to personnel based on project activities identified in the Scope of Work (i.e., life threatening) and EMS response time (i.e., less than 15 minutes). See Section 6.9.
- Emergency response – only applicable to workers engaged in emergency response as per 29 CFR 1910.120(q).
- Fire Protection

If needed, the following training topics may be provided on the project as applicable:

- General – all workers engaged in activities which are potentially exposed to hazardous substances and health hazards must be trained to meet 1910.120(e)(1). Annual 8-hour refresher training as per 29 CFR 1910.120(e)(3) is required for workers and supervisors must be trained to meet 29 CFR 1910.120(e)(4).
- Respiratory protection – as per 29 CFR 1910.134. Medical qualification by a physician is required to wear a respirator. Annual fit testing and training is also required.
- Excavation/trenching – as per 29 CFR 1926.651.
- Respiratory protection
- Lockout/Tagout (LOTO)
- Power operated hand tools

The PM determines the necessary training and coordinates the training with the Parsons' SH&E experts certified in the topics they instruct.

7.6 SPECIALIZED TRAINING AND ORIENTATIONS.

Project personnel receive specialized training on client rules and requirements as well as the unique tools, equipment, and procedures used to perform the work. The project budget includes funding for the following training:

Description	Attendees	Schedule
General rules and safety requirements	All workers assigned to the site	Half-hour training session, provided to new employee on the first day of work at the site.
Honeywell Contractor Safety Handbook (Attachment E)	All workers assigned to the site	Handbook should be provided for review during site orientation training.
Additional To Be Determined		

EXHIBIT 7-1
INITIAL SUBCONTRACTOR EMPLOYEE TRAINING ACKNOWLEDGEMENT

Name of Trainer: _____

Training Subject: _____

Training materials used: _____

Name of employee: _____

Date of hire/assignment: _____

I, _____, hereby certify that I have received training as described above in the following areas:

- Names of personnel responsible for site safety and health.
- Safety, health or other hazards at the site.
- The proper use of personal protective equipment.
- The potential occupational hazards in general in the work area and associated with my job assignment.
- Work practices by which a worker can minimize risks from hazards.
- Safe use of engineering controls and equipment on the site.
- Acute effects of compounds on the site.
- Decontamination procedures.
- General safety requirements indicate the safe work conditions, safe work practices and personal protective equipment required for my work.
- The hazards of any chemicals to which I may be exposed and my right to information contained on material safety data sheets for those chemicals, and how to understand this information.
- My right to ask questions, or provide any information to the employer on safety either directly or anonymously without any fear of reprisal.
- Disciplinary procedures the employer will use to enforce compliance with general safety requirements.

I understand this training and agree to comply with general safety requirements for my work area.

_____ _____

Employee Signature Date

EXHIBIT 7-2
SUBCONTRACTOR COMPETENT PERSON FORM

Definition

A competent person is a person having the ability to recognize existing and predictable hazards and having the authority to correct them.

Responsibility

The designated subcontractor competent person is responsible for recognizing and correcting safety risks/hazards. This person has the authority to stop work in a potential safety concern on the jobsite. This Subcontractor Manager and competent person are considered the contacts for Parsons projects.

This form must be completed by each subcontractor's manager and the subcontractor's designated competent persons. ***Where a subcontractor is responsible for multiple crafts, it will be necessary to maintain additional designated competent persons and forms.*** Each subcontractor on a Parsons project must submit this completed form to the Parsons Project Manager before beginning work on the project and must update it any time the designated representative(s) changes.

Acknowledgment

I,_____ representing, _____
Subcontractor Manager **Subcontractor Company Name**

have assigned _____ to be the competent person in the areas indicated and I _____ acknowledge that this individual has been thoroughly trained and is experienced in hazard recognition and has the authority to stop work and correct hazards in the event of a potential hazardous or imminent danger situation.

_____ _____
Subcontractor Manager (Signature) **Date**

I, _____ acknowledge that I have been thoroughly trained and have the experience
Competent Person (Signature)

to perform the duties as the _____competent person in the areas marked below and
Subcontractor Company Name

I understand that I have the responsibility and authority to correct hazards and to stop work in the event of a potential hazardous or imminent danger situation.

_____ Asbestos	_____ Hearing Protection	_____ Welding/Cutting
_____ Respiratory Protection	_____ Scaffolding	_____ Rigging
_____ Cranes/Derricks	_____ Electrical	_____ Lead
_____ Fall Protection	_____ Ladders	_____ Excavations/Trenches
_____ Demolition	_____ Tunnels/Shafts	_____ First Aid/CPR
_____ Underground Const.	_____ Material/Personnel Hoists	_____ Concrete/Forms/Shoring
_____ Marine Work/Diving	_____ Bolting/Riveting/Fitting	_____ Mechanical Demolition

Exhibit 7-3
Safety Meeting Sign-In Sheet

Safety Meeting Presenter: _____ Date: _____

Current Weather Conditions:

Temperature (°F) = _____ Wind Direction = _____ Wind Speed = _____

Clear – Sunny – Cloudy – Rain – Snow Forecast = _____

Current Site Conditions (circle as appropriate):

Dry – Wet – Muddy – Frozen – Snow Covered – Other (describe) _____

1. Incidents or Injuries to report from Previous Day Activities: No □ Yes □ - explain below:

_____

2. Safe and/or At-Risk Observations from Previous Day Activities:_____

_____

3. Activities Taking Place Today: _____

_____

3. Anticipated Hazards: _____

_____

4. Engineering Controls-Work Practices-PPE to Protect Against Hazards: _____

_____

5. Additional Safety Topic or Comments: _____

_____

PRINTED NAME	SIGNATURE	COMPANY

SECTION 8

RECORD KEEPING AND POSTING

Parsons and its subcontractors must comply with the recordkeeping requirements of the regional, municipal, local, and/or OSHA regulations, Owner, Parsons Corporation, and this PSHEP, including:

- OSHA 300A logs
- Medical treatment and follow-up
- Cranes
- Heavy equipment inspection logs
- Fall protection
- Training
- Inspections
- Audits
- Others as required

Parsons Talent Management and the SH&E Manager are the official recordkeepers for files relating to Parsons' employees. Each subcontractor maintains its own files.

The project displays regional, municipal, local, and/or OSHA regulations posters in conspicuous places, as required by regional, municipal and local regulations, including one poster on the main bulletin board located outside in the H&S/State bulletin board outside of the craft labor trailer.

The OSHA 300 log for the project or the Market shall be posted from February 1 – April 30 of each calendar year.

SECTION 9

SAFETY AND HEALTH REQUIREMENTS

Exhibit 9-1 represents regional, municipal, local, and/or OSHA regulations, owner, and Parsons corporate regulations and requirements applicable to the project. Based on the most recent risk assessments, the Parsons PM and SSO update the listed topics periodically. Training and other requirements are updated in this PSHEP as required by changes to Exhibit 9-1, Competent Person and Activity Hazards Analysis Requirements.

The SH&E Legal Compliance Register is included as Attachment H. This document identifies the SH&E legislation, standards, codes, and regulations relevant to Parson's activities during this project.

Parsons and its subcontractors are individually responsible for training their respective employees and for complying with all project requirements. Failure to comply could lead to disciplinary actions against Parsons' employees and subcontractors or their employees. Further guidance is available in the Parsons Corporate Safety and Health Manual; Pweb link is as follows: Corporate Safety and Health Manual.

EXHIBIT 9-1
COMPETENT PERSON AND ACTIVITY HAZARDS ANALYSIS REQUIREMENTS

Safety and Health Requirement	OSHA Regulation	EM 385-1-1 Regulation	Competent Qualified Person-Supv	Training Required	AHA Required
1. General Safety & Health	1926.20	01.A	*Yes*	*Yes*	*Yes*
2. Safety Training	1926.21	01.B.01	*Yes*	*Yes*	*Yes*
3. First Aid and Medical	1926.23, 50	03.A	*Yes*	*Yes*	*Yes*
4. Fire Protection and Prevention	1926.24, 150-155, 352	09.A	*Yes*	*Yes*	*Yes*
5. Housekeeping	1926.25	14.C	*N/A*	*N/A*	*N/A*
6. Sanitation	1926.27, 51	02.A	*N/A*	*N/A*	*N/A*
7. Personal Protective Equipment	1926.28, 95-98, 100-107	05.A	*Yes*	*Yes*	*Yes*
8. Emergency Employee Action Plans	1926.35	01.E	*Recommended*	*Yes*	*Yes*
9. Noise Exposure	1910.95; 1926.52	05.C	*Yes*	*Yes*	*Yes*
10. Gases, Vapors, Dusts and Mists	1926.1926.55		*Yes*	*Yes*	*Yes*
11. Hazard Communication	1926.59	1.B.06	*Yes*	*Yes*	*Yes*
12. Hazardous Waste Operations and Emergency Response	1910.120; 1926.65	28.A	*Yes* *Supv – 8 hr*	*Yes*	*Yes*
13. Accident prevention signs and tags	1926.200	08.A	*N/A*	*N/A*	*N/A*
14. Signaling	1926.201	08.B	*Recommended*	*N/A*	*Yes*
15. Barricades	1926.202		*N/A*	*N/A*	*N/A*
16. Material Storage	1926.250	14.B	*N/A*	*Yes*	*Yes*
17. Waste Disposal	1926.252	14.D	*Yes*	*Yes*	*Yes*
18. Tools	1926.300-307	13.A	*N/A*	*N/A*	*Yes*
19. Motor Vehicles, Mechanized Equipment	1926.600-603	18.A	*Yes*	*Yes*	*Yes*
20. Site Clearing	1926.604	31.A	*N/A*	*Yes*	*Yes*
21. Excavations	1926.650-652	25.A	*Yes*	*Yes*	*Yes*
22. Excavation Permit	N/A	N/A	*Yes*	*Yes*	*Yes*
23. Internal Traffic Control	N/A	8.D	*N/A*	*Yes*	*Yes*
24. Traffic Movement Restriction Times	N/A	8.C	*N/A*	*Yes*	*Yes*
25. Boating	General Duty	-	*Yes*	*Yes*	*Yes*

ATTACHMENT A

PARSONS REQUIREMENTS

On-Line Safety Reporting System

Policy Requirements

- Initial incident reports for all incidents, including near misses, shall be reported within 2 hours.
- Detail incident reports are required within 24 hours.
- Reporting is done via on-line (PWeb) incident report form.
- Injuries with Days Away from Work - immediate supervisor and PM must teleconference with GBU President within 4 hours.
- Projects enter hours via on-line form by FIRST Friday of new period.

Reporting Incidents

Corporate policy requires that all employees report safety incidents to their supervisor immediately. Supervisors must report all incidents to the appropriate Project Manager (Department Manager if the incident is not related to a project), who must officially report the incident to the GBU within four hours. This official reporting is done via the PWeb, unless PWeb is unavailable, in which case the incident can be reported by email, fax or telephone.

"Incidents" include work related injuries, work related illness, accidents with property damage only and near misses. "Near misses" are any unplanned event that had the potential to (but did not) result in injury or property damage.

Incident reports should reflect the best available information at the time. Where exact information is not known (recordability, days away from work, etc.) the PM's best judgment should be used when completing the initial incident report. This information can be subsequently revised when the detail incident report is submitted.

When in doubt, submit an initial report or contact the GBU Safety Manager.

On-line Reporting System

The on-line reporting system can be found on the PARCOMM Safety Page on PWeb. To locate the system, follow these steps:

1. From the Corporate PWeb Homepage, select PARCOMM from the Org Units menu
2. Locate and select "Safety" from the header
3. Select the "Online Safety Reporting" link

To create and submit a new incident report, select the orange "Add" button from the main page of the reporting system. To update and existing incident report or complete the Detail Incident page, locate and select the appropriate incident from the list.

Creating or Updating Incidents

The Initial Incident page of the report must be completed within four hours of the incident occurring. This page includes basic information needed for the first notification to our insurance carriers. If possible, all of the fields should be completed in the initial report. A list is provided at the end of this document describing all fields contained on the initial incident page.

Incident Detail Reports

Within 24 hours of the incident occurring, the Incident Detail page of the on-line report must be completed. This page includes detailed information about the injured party, the nature and extent of injuries, medical treatment provided, corrective actions taken, and witness statements. In the event of property damage, this page also includes descriptive information on the property owner. Finally, the page includes a section to include electronic attachments. These might include photographs, signed witness statements, etc.

Monthly Reporting of Hours

Hours must be entered into the on-line reporting system no later than the first Friday of the new period. If an accurate accounting of hours is not available, estimated hours are submitted into the system. The estimated hours can be revised later in the month, or the following month, when accurate data is available.

From the "Hours" page, select "PAR" from the GBU drop down menu and the period (month and year) that is being reported. The system only allows hours to be entered for the period selected. MTD and PTD figures are calculated totals based on the sum of all monthly entries. To enter or correct a prior period entry, simply select that month from the drop-down box and correct the figures for that month. If the name of your "Project" is not alphabetically listed on any of the multiple pages, then select "Field Administration/Other – Industrial".

Be sure to select the correct month and year when entering hours.

Hours must be entered for each (as applicable) of six different labor categories. The categories are as follows:

- Contractor (Field/Craft)
- Contractor (Office/Admin)
- JV Partner (Field/Craft)
- JV Partner (Office/Admin)
- Parsons Employee (Field/Craft)
- Parsons Employee (Office/Admin)

Monthly Statistics Summary Reports

The on-line reporting system automatically calculates incident rates based on incidents and hours entered into the system. To view the statistics, select the "Reports" page from the on-line system. Select "Parsons Safety Statistics Summary", the appropriate GBU, and the appropriate period. (NOTE: The system does not yet provide reports at the Division and Sector level. That enhancement is pending.) Use the checkboxes to select the labor categories desired.

Contact Brad Barber or Greg Beck for Assistance

Initial Incident Report Fields

1. GBU – Select the GBU from the drop down box. Incidents are reported primarily by project, and the GBU should reflect the unit responsible for the project. This may be different from the GBU that employees the person injured.
2. Field Project Name, Office Location or Other – if the injury occurred in the field, then select the appropriate name from the alphabetical listing in the "Field Project" drop down box. If an appropriate name does not exist, select "Field Administration/Other-Industrial". If the incident occurred in a Parsons office, select the office name from the "Office Location" drop down box. ONLY select Field Project or Office Location, not both (or Other). If the appropriate Office Location is not provided, manually enter it into the "Other" box.
3. Job and WBS Numbers – These fields should reflect the charge number responsible for the incident. In general, that will be the number that the employee was charging at the time of the incident. Projects are responsible for visitors, regardless of what charge number they use while visiting the job. For example, if the Division Manager is injured while visiting Project X, the project number is entered, not the division overhead account.
4. Near Miss – Check this box if the report is for a near miss only (no injury or property damage occurred).
5. Emergency Response Notified – Check this box if fire, police or ambulance was called as a result of the incident.
6. Three or More Employees Hospitalized – Check this box if three or more employees were injured as the result of a single incident. In this case, the GBU or Corporate Safety Manager must also be immediately notified by telephone.
7. Extent of Injury – Select the appropriate radio button. First aid cases are as defined by OSHA 1904 criteria. All other injuries are considered recordable.
8. Restricted Duty (# of days) – If the injured person was limited (by a physician) to less than normal work duration or duties, enter the number of days. Estimate the days if unknown, and correct the number later. NOTE: this is the number of CALENDAR days (not scheduled work days), and it does NOT include the day of the injury.
9. Days Away From Work (# of days) – If the injured person was ordered by a physician not to return to work, enter the number of days missed. Estimate the days if unknown, and correct the number later. NOTE: this is the number of CALENDAR days (not scheduled work days), and it does NOT include the day of the injury. Injuries with Days Away From Work require a phone call to the GBU President within 4 hours.
10. Fatality (Date of Death) – In the event of a work related fatality, enter the date of death here. NOTE: Fatalities require immediate phone notification of the Division Manager, GBU President, GBU Safety Manager, and Corporate Safety Manager.
11. Property Damage – Check the appropriate boxes if applicable.
12. Place – Describe the exact location that incident occurred. For example, "in the north stairwell of building 21, between the second and third floor."
13. Date – This field reflects the date the incident occurred, not necessarily the date it was reported. If the exact date is not known, an estimate should be used.
14. Time – This field reflects the time of day that the incident occurred. If the exact time is not known, an estimate should be used.
15. Incident Description – Provide a detailed description of the incident. This is a memo field and text will scroll down the window as it is entered. Use as much space as needed to accurately describe the incident and the resulting injuries.
16. Reported by – This field defaults to the employee login ID that was used to access PWeb. However, the field can be over-written if needed.

17. Name – First and last name of the injured party.
18. Status – Select the most appropriate category from the drop box (Employee - Field, Subcontractor - Field, Partner - Field, Employee - Office, Subcontractor - Office, Partner - Office or 3rd Party).
19. Trade/Function – Select the most appropriate category from the drop box.

Parsons Project Incident/Accident Report Form

PLEASE PRINT

Attach all supplemental documentation, including photos, diagrams, witness statements and field reports

Project Information	Project Title		Location	
	Subcontractor			
	Address			
	City, State, Zip			
	Contact Name		Phone Number	

Incident Type	☐ **Worker's Compensation**	☐ **General Liability**	☐ **Builder's Risk**
	☐ Emergency Response Notified (Police, Fire, Medic, etc.)	☐ Bodily Injury/Illness	☐ Equipment
		☐ Real Property Damage	☐ Supplies
	☐ First-Aid Only	☐ Personal Property Damage	☐ Machinery
	☐ Recordable Injury	☐ Utility Property Damage	☐ Work

Incident Location	Date of Loss		Time of Loss	
	Place (exact location)			

Incident Description	Detailed Description of Accident

Worker's Comp Or Personal Injury (circle one)	Injured Name			
	Address			
	City, State, Zip			
	Home Phone		Date of Birth	
	Nature of Injury			
	Medical Facility		Work Status	
	Treatment Received			

Property Damage Or Builder's Risk (circle one)	Owner's Name			
	Address			
	City, State, Zip			
	Home Phone		Work Phone	
	Damage Type		Estimated Cost	
	Utility Type		Marked or Unmarked	
	Description of Damage			

Witness Information	Name			
	Address			
	City, State, Zip			
	Home Phone		Work Phone	
	Where to contact		Time to contact	

Contractor Subcontractor Action	Describe actions taken

Signature _____ Employer _____
Print Name _____ Date _____
Phone No. _____ Fax Number _____

PARSONS	NEAR MISS REPORT FORM

EMPLOYER

1. Name: _____
2. Mail Address: _____
   (No. and Street) (City or Town) (State and Zip)
3. Location :_____
   (if different from mail address)

NEAR MISS DESCRIPTION

4. Location of near miss:_____
   (No. and Street) (City or Town) (State and Zip)
5. Project: _____
6. Was place of near miss on employer's premises? Yes ( ) No ( )
7. Time of near miss: _____
8. Date of near miss: _____
9. How did the near miss occur? _____
   (Describe fully the events that resulted in the near miss.)

   _____

   Tell what happened and how. Name objects and substances involved. Give details on all factors that led to

   _____

   near miss. Use separate sheet for additional space).
10. What was employee doing when near miss occurred?_____
    (be specific-was employee using tools or equipment

    _____

    or handling material?)

    _____

WITNESS TO MISS

_____ _____
(Name) (Affiliation) (Phone No.)

_____ _____
(Name) (Affiliation) (Phone No.)

RECOMMENDATIONS TO PREVENT NEAR MISS FROM RECURRING

_____

_____

PARSONS PARCOMM®

Field/Project Monthly Report Form

Instructions: Enter the total number of labor hours spent in the field by all Parsons employees and subcontractors during the reporting period. Cost Type (CT) "04" used for WebTime labor entries should represent these hours for Parsons employees. Labor hours spent in the office are classified as CT "01" in WebTime. Incidents/near-miss incidents, air monitoring completed and the type of PPE worn by personnel (i.e. Parsons employees and contractors) must also be reported. Submit by the 3rd working day of the following month (an estimation of the monthly field hours based on number of people working on the project each day is acceptable).

Definitions and Reporting Criteria

Field Hours - time spent by the employee working at a job site or field project, even if performing office/administrative work (i.e. in a modular trailer). Working in another Parsons office or at a client's corporate/main office is not considered field hours for the purposes of this reporting.

Incident - any unplanned or unexpected event, including near-misses, first aid cases, personal injuries requiring medical treatment, vehicle or equipment damage or an environmental release.

Near-miss Incident (NI) - an unplanned or unexpected event that has the potential to result in a personal injury, vehicle or equipment damage, or environmental release, but does not occur (i.e. almost happened).

PPE - Personal Protective Equipment above Level D (work clothes) or Modified Level D (Tyvek or fire retardant coveralls). This includes Level C (chemical resistant suit and/or air-purifying respirator), Level B (chemical resistant suit and/or supplied air) or Level A (full encapsulation suit with SCBA).

Subcontractor - contractors hired by Parsons or a Parsons contractor, to perform activities in the field. Contractor company names should be listed and tracked separately in the Table below, followed by the hiring company in parentheses (i.e. Parsons or subcontractor).

Project Name:		Client:			
Project Location:		Client Contact:			
Parsons Contact:		Project #:		Month:	

Parsons and/or Contractor	Hours	Type of Activities	Incident or NI
Parsons			Yes No
			Yes No
			Yes No
			Yes No

Air Monitoring

Was there any air monitoring that took place during the month? No Yes - If "Yes", indicate below the potential hazards/chemicals monitored (i.e. O2, LEL, dust, VOCs), the monitoring equipment used (i.e. PID, FID, Draeger tubes, 4-gas, DataRAM, cassettes), whether the air monitoring results exceeded an Action Level (AL) or Permissible Exposure Limit (PEL), the level of PPE worn above Level D (C, B or A) and the number of days working in the specific PPE.

Chemical Monitored	Equipment Used	Exceed AL– Exceed PEL	PPE	Days in PPE
		Yes No - Yes		
		Yes No - Yes		
		Yes No - Yes		
		Yes No - Yes		

NOTE: If an AL/PEL is exceeded or PPE above Level D is worn, a Supplemental Information Form (available in the Industrial Division Safety Folder on ParShare) must be completed. All incidents must be reported on the PWeb (PARCOMM Online Safety Reporting System).

Rev. 7/12/06

ATTACHMENT B

HONEYWELL REQUIREMENTS

HONEYWELL, SYRACUSE, NEW YORK
EVENT REPORTING REQUIREMENTS
REVISION 3 – 5/20/16

1. INTRODUCTION

To assure Honeywell Health, Safety and Environmental Remediation (HSER) leadership has sufficient knowledge of significant adverse events to enhance decision-making and drive improved performance, the following event reporting procedure will be followed to report Safety & Environmental Incidents and Near Misses (referred to as events in this procedure) for all Honeywell Syracuse Portfolio projects.

These requirements will be reviewed with project staff when they start working on the projects and on a regular basis thereafter.

2. CONTRACTOR REPORTING TO HONEYWELL SYRACUSE PERSONNEL

Event reporting to Honeywell management is the responsibility of Syracuse Honeywell personnel. Contractor personnel should report the incident to the Syracuse Honeywell personnel per Section 2.2 as soon as it is safe to do so. When that call is made, provide the information listed below to assist in classifying the event. *If the event involves any of the items listed under Tier 1 Events and none of the Honeywell Syracuse personnel can be reached within two hours of the event, contractor personnel should make the Honeywell contacts required in Section 3.*

2.1 INCIDENT REPORTING (Copied from the HSP2 dated May 2016)

The Alliance Partner PM and HSP^2 Safety Director or Safety Manager must be **notified** by the SHSO of any incident immediately.

After notification, **written incident reports** must be submitted by the SHSO to the HSP^2 Safety Director in accordance with time frames shown the following table. Honeywell representatives will be notified within prescribed time frames. Specific contact names and numbers will be outlined in safety plans and JSA forms.

	Tier 1 Incident	Tier 2 Incident	Tier 3 Incident
Notification to the Alliance Partner PM and HSP^2 Safety Director or the HSP^2 Safety Manager	Immediate Notification		
Notify Honeywell RES Management or Operations Manager by the O'Brien & Gere or Parsons PM	1 hr	4 Hours	12 Hours
Incident Report (written)	Written report within 24 hrs – (All known facts and updated as necessary)		
Entry into Honeywell Event Tracking System	1 Day	1 Day	1 Week

Tier 1 Examples

- One or more on-site or off-site fatalities involving an employee, contractor employee or visitor that are or may be work-related.
- A single work-related on-site or off-site incident resulting in three or more employees, contractors or visitors being admitted to a hospital.
- Any off-site fatalities to the general public that allegedly are or may be related to Honeywell.
- Any security incident that may be immediately dangerous to life or property, including, bomb threats, intentional explosions, chemical releases, radiation releases, or releases of biological/chemical agents.
- Fires that: (a) resulted in significant property damage, or, regardless of the level of damage, (b) were extinguished by a fire department using other than handheld fire extinguishers, or (c) were extinguished by a fire suppression system (other than an integrated fire suppression system within a piece of equipment) or (d) significantly halted operations.
- Suspicious materials, package or letter for which outside authorities were called in to investigate.
- Serious injuries or illnesses in the general public allegedly associated with a company-related incident, event or release to air, water or soil.
- A release to air, water or soil that has an Adverse Environmental Impact which includes a release that triggers a regulatory inquiry.
- Events generating community activism or adverse media coverage not associated with an episodic event at the national/international level.
- Government representatives alleging or suggesting criminal non-compliance of any kind.
- A regulatory agency inspection with notice of fine, penalty or corrective action that has a directive or other type of injunctive device designed or likely to halt, curtail, or restrict operations.

Tier 2 Examples

- Employee or contract employee lost workday injuries/illnesses.
- Any on-site or off-site injuries/illnesses involving an employee, contractor employee or visitor that are or may be work-related and are significant enough to be recordable (e.g., vaccination or doctor prescription).
- Minor injuries or illnesses in the general public that allegedly are associated with a company-related incident, event or release to air, water or soil.
- Suspicious activities in or around Honeywell facilities or processes that may present a potential security risk.
- Fires extinguished using handheld fire extinguisher(s) or an integrated fire suppression system internal to a piece of equipment that did minimal property damage, and did not halt operations.

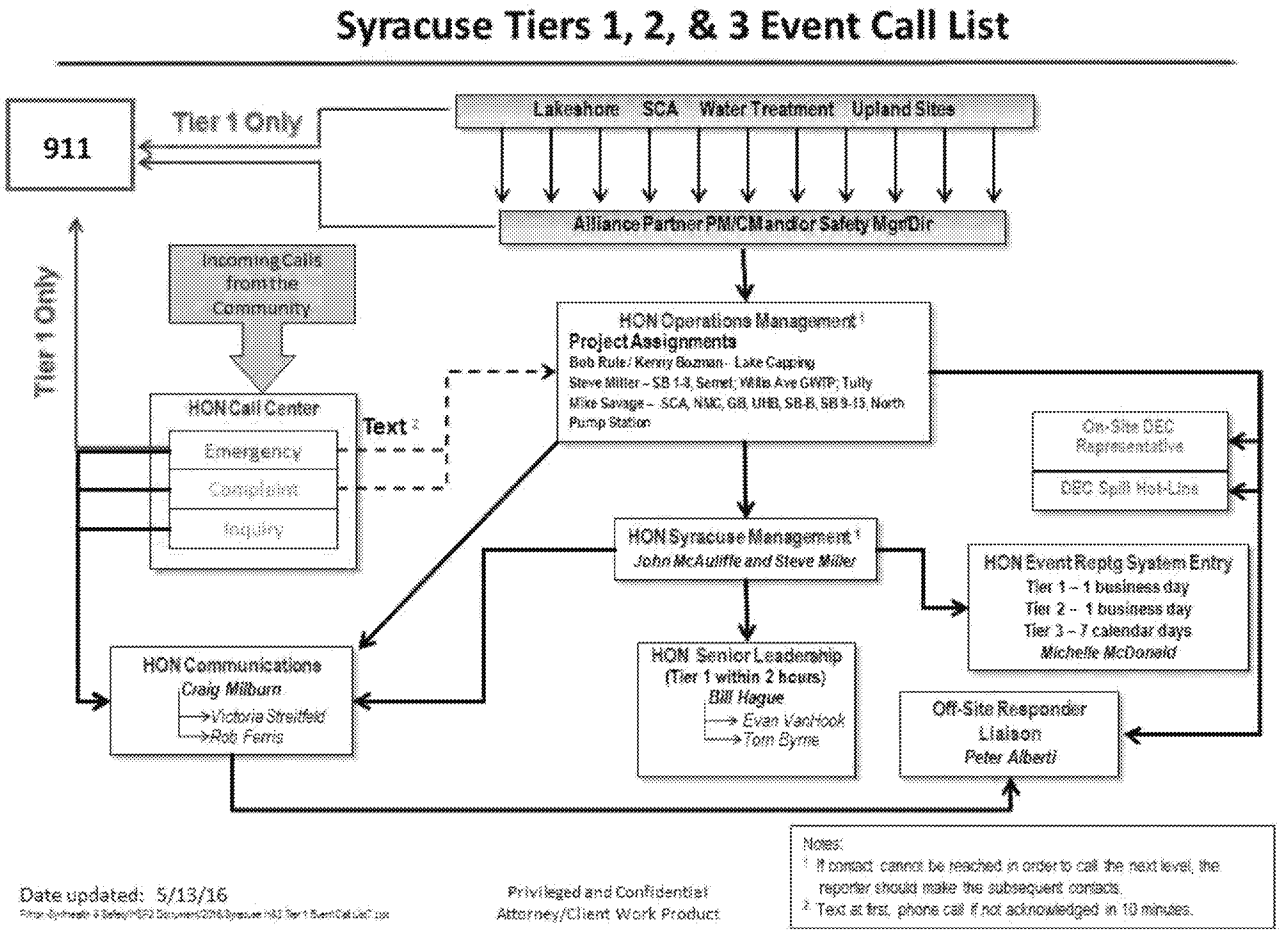
- Allegations of previously unknown health or environmental effects caused by products, processes, emissions or discharges Allegations of Adverse Health Effects, Hlth-19.
- An environmental excursion that does not also trigger Tier 1 reporting.
- Discovery of potential or actual evidence of contaminated soil or groundwater from current or former operations that does not otherwise meet the definition of an adverse environmental impact.
- Written notification from a governmental agency alleging non-compliance of any kind.
- Proposal or imposition of an HSER fine, penalty or corrective action.
- Receipt of a non-routine request for information from a governmental agency.
- A regulatory agency inspection (excluding those that are Tier 1 Events) with notice of fine, penalty or corrective action.
- An excursion from a permit condition which requires a notification to be sent to an agency that results in any notice of fine, penalty or agency corrective action.
- All HSE audits, including Corporate audits, Peer review, the annual SAT (Self-assessment tool), audits for external HSE certification processes, and SBU audits or special initiatives.
- Any evaluations made by third parties such as HSE consultants or contracted HSE services. Recommendations from such evaluations must be entered as recommendations in the Event Tracking System.
- Significant community activism or adverse media coverage not associated with an episodic event at the local/state level.
- Notice of an allegation from a third party or regulatory agency of environmental impacts from operations on current or formerly operated Honeywell facilities.
- Demands, including voluntary agreements, to conduct a site investigation or remedial measures to respond to environmental impacts from operations on current or formerly operated Honeywell facilities.
- Receipt of an information request or special notice letter associated with the disposal, transportation or storage of hazardous substances by Honeywell or its predecessors.
- Identification of any condition or circumstance which falls under the criteria of "Issues requiring TRAC approval" for which TRAC approval was NOT obtained. The Risk Assessment Committee (TRAC) - HSEMS 605.

Tier 3 Examples

- On-site or off-site employee, contractor employee or visitor injuries/illnesses where first-aid treatment or evaluation is provided by a Medical or Para-Medical Professional (e.g., with no vaccination, prescription, or lost time).

- A regulatory agency inspection (which is not a Tier 1 or Tier 2 Event, and may still be underway) with no notice of fine, penalty or corrective action.
- A notification required to be sent to an agency based on an excursion from a permit condition that does not result in any notice of fine, penalty or agency corrective action as directed by the SBG for reporting:
- Employee, contractor or visitor injuries/illnesses injury/illness where first-aid treatment or evaluation is provided by someone other than a Medical or Para-Medical professional.
- Significant near misses.
- Stewardship outreach events with customers, suppliers and/or communities, Operations successes at facilities (i.e., ISO Certification, VPP, OHSAS, local or state recognition, etc.).
- An environmental excursion that does not also trigger Tier 2 reporting.

3. TIERS 1, 2, & 3 EVENT CALL LIST (Copied from the 2016 HSP2)



Syracuse Event Call List – Phone Numbers

	Office #	Mobile #	Home #	Alternate #
HON Operations Management				
Kenny Bozman	NA	440.228.5827	NA	NA
Bob Rule	315.741.3743	865.548.6719	865.671.4981	NA
Mike Savage	315.741.3720	315.436.0765	NA	630.235.1423
HON Syracuse Management				
John McAuliffe	316.552.9782	315.440.0859	315.699.1565	NA
Steve Miller	315-741.3723	315.935.5400	315.622.5301	315.552.9713
Michelle McDonald	315.552.9783	315.415.2420	315.699.9414	NA
HON Communications				
Craig Milburn	315.552.9784	315.952.4751	315.303.4975	NA
Victoria Streitfield	973.455.5281	973.722.1324	NA	NA
Rob Ferris	973.455.3388	973.204.9621	NA	NA
Offsite Responder Liaison				
Peter Alberti	NA	315.427.7801	NA	NA
HON Senior Leadership				
Bill Hague	973.455.2175	973.896.9366	973.292.5934	315.741.3727
Evan Van Hook	973.455.4132	862.222.7705	NA	NA
Tom Byrne	973.455.2775	973.610.4816	NA	NA
NYSDEC				
Tim Larson	518.402.9676	518.402.0665	NA	315.484.2721
Bob Edwards	518.402.9676	518.469.5883	NA	315.484.2721
24-Hour Spill Hotline	800.457.7362			
Regional Spill Response - Richard Brazell	315.426.7523			315.426.7400

ATTACHMENT C

ACTIVITY HAZARD ANALYSES

Activity Hazard Analysis Master List

(to be updated as new task/activities are required)

AHA's to be developed prior to start of work:

ATTACHMENT D

CONTRACTOR MODEL SUBCONTRACTOR SAFETY, HEALTH, AND ENVIRONMENT PLAN (SSHEP)

NOTE: Italic text in bright red font provides directions for completing the SSHEP and should be deleted after providing the appropriate information.

PREFACE TO CONTRACTOR FOR PREPARING THE SSHEP

This template gives general directions on how to prepare your site-specific safety, health, and environmental plan (SSHEP). It is as an aid for contractors; contractors are solely responsible for the content of their SSHEPs. This template was written for a broad spectrum of contractors and each contractor shall modify it to address the requirements of the particular Parsons' project on which it is working. The SSHEP shall contain the information in the following table.

Information Required in an SSHEP

Section	Title	Section	Title
1	Project Owner, Project Name, and Contractor's Safety, Health, and Environmental Policy Statement	11	Integration of SH&E Risk Mitigation Planning in 2-Week Look-ahead Submissions
2	Scope of Work Evaluation	12	Employee Participation and Consultation
3	Responsibility and Identification of Key Personnel	13	Emergency Action Plan
4	Overall Assessment of SH&E Hazards, Exposures, and Risks	14	Site-specific Medical Emergency Plan
5	Relevant SH&E Compliance Programs, Associated Compliance Information, and Personnel Responsibility Assignments	15	Incident Reporting, Investigation, and Corrective Action Processes
6	SH&E Compliance Training Matrix and Training / Education Processes	16	Work Site Inspection and Program Audit Processes
7	Site-specific Worker Orientation Program	17	Progressive Disciplinary Program
8	Identification of Competent / Qualified Personnel	18	Recordkeeping / Document Retention Processes
9	Hazard Identification, Notification, and Correction Process	19	Other (as defined by Contractor or Parsons)
10	Specific Hazard and Risk Control Measures (e.g., Activity Hazard Analyses, Operational Risk Management Processes)	20	Other (as defined by Contractor or Parsons)

The following checklist will be used by the project manager or designee to determine if the SSHEP is acceptable to Parsons.

Date: _____ **Project/Location:** _____

Contractor Name: _____ **Parsons SH&E Representative:** _____

The information provided here is based on a review of the contractor site-specific safety, health, and environmental plan (SSHEP). Areas identified as incomplete shall be revised based on the standards in the contract specifications and the project safety, health, and environmental plan (PSHEP). Contractors shall resubmit revised sections of the SSHEP to the project manager within 1 week of receiving this review documentation.

Section	Complete	Incomplete	Section	Complete	Incomplete
Statement of SH&E Policy	☐	☐	Specific Activity Hazard Analyses (AHAs) and Operational Risk Assessments	☐	☐
Scope of Work Evaluation	☐	☐	Adequate Hazard / Risk Controls	☐	☐
Key Line Personnel Identified	☐	☐	2-Week Look-ahead Planning	☐	☐
Overall Assessment of Hazards and Risks	☐	☐	Employee Participation and Consultation	☐	☐
Relevant SH&E Compliance Programs (Hazard Communication, PPE, HAZWOPER, Hazardous Energy Control, Fall Protection, Confined Space Entry, RCRA, etc.)	☐	☐	Emergency Action Plan	☐	☐
SH&E Compliance Program Responsibilities Assigned	☐	☐	Site-specific Medical Emergency Plan	☐	☐
Compliance Training and Education Programs	☐	☐	Incident Reporting, Investigation, and Corrective Action Processes	☐	☐
Site-specific Worker Orientation Program	☐	☐	Work Site Inspection and Program Audit Processes	☐	☐
Competent and Qualified Personnel Identified	☐	☐	Progressive Disciplinary Program	☐	☐
Hazard Identification, Notification, and Correction Process	☐	☐	Recordkeeping / Document Retention Processes	☐	☐

Additional Comments / Other SSHEP Sections or Information Required

_____

_____

_____

_____

Reviewed by:

Name **Title**

_____ _____ _____

Proper use of this model plan requires your firm's project manager to carefully review the requirements for each SSHEP element. Complete the appropriate blank spaces and check those items that are applicable to your workplace. The SSHEP must be implemented by the contractor's project manager for it to be effective.

Every Parsons contractor shall establish, implement, and maintain a copy of a written SSHEP at each work site. The purpose of the SSHEP is to help ensure that the contractor is willing and able to support the Parsons goal of zero SH&E incidents.

Parsons may conditionally approve the SSHEP with elements that are "to be determined", especially elements that are not relevant until a future phase of work. The contractor along with the Parsons project manager shall maintain and update the SSHEP as a living document that reflects changes in personnel, hazards, or risk management strategies as the project progresses.

Note: *Delete the previous text and start the SSHEP here.*

Contractor Company Name Here

Common Project Name Here

Contractor Site-specific Safety, Health, and Environmental **Plan (SSHEP)**

SSHEP Approval Date Here

Table of Contents

Note: *The above Table of Contents is built around the existing template headings. If you are using Microsoft Word, after completing the SSHEP using this template, press "F9" and the above Table of Contents will automatically conform to the structure of your document.*

Contractor's Safety, Health, and Environmental Policy Statement

This plan contains the minimum requirements for an effective contractor site-specific safety, health, and environmental Plan (SSHEP) by *contractor company name here* for the *common project name here*. This SSHEP shall be implemented and maintained by *contractor company name here*. This SSHEP applies to all persons of our company.

The leadership team is responsible for ensuring that all SH&E policies and procedures are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

Our system of ensuring that all workers comply with the rules and maintain a safe work environment includes the following.

- Informing workers of the provisions of this SSHEP
- Evaluating the SH&E performance of all workers
- Recognizing employees who consistently perform SH&E work practices very well
- Providing training to workers whose SH&E performance is deficient
- Disciplining workers for failure to comply with safe, healthful, and environmentally responsible work practices

The contractor shall add additional bullets, as appropriate.

The contractor shall attach its formal corporate SH&E policy statement(s).

Scope of Work Evaluation

The contractor shall list the work activities and anticipated schedule.

Responsibilities and Identification of Key Personnel

These personnel have authority and responsibility to implement this program.

The contractor shall complete this table and augment it as needed.

Contractor:		
Address:		
Telephone	**Fax**	**Email**
Company Executive responsible for project		**Contact No.**
		Direct Line: Cell Phone: Email:
Manager/Superintendent:		**Contact No.**
		Direct Line: Cell Phone: Email:
Safety Representative/Manager:		**Contact No.**
		Direct Line: Cell Phone: Email:
Key Foreperson or Forepersons:		**Contact No.**
		Direct Line: Cell Phone: Email:
Client Project Management Point of Contact:		**Contact No.**
		Direct Line: Cell Phone: Email:

Project Site Location	**General Onsite Contact No.**
	Direct Line: Cell Phone: Email:

All managers and supervisors are responsible for implementing and maintaining the SSHEP in their work areas and for answering worker questions about the SSHEP. Managers and supervisors shall make a copy of this SSHEP available to all workers.

Overall Assessment of SH&E Hazards, Exposures, and Risks

The contractor shall list the SH&E hazards, exposures, or risks associated with the scope of work.

Activities shall be evaluated and activity hazards analyses (AHAs) or other effective risk management process shall be developed. AHAs and other risk management processes are described in Section 10 and included in this SSHEP.

SH&E Compliance Programs

Contractor company name here shall comply with relevant SH&E laws and regulations. Written compliance programs shall be implemented on our job sites and coordinated with other site contractors, our lower-tier subcontractors, and with Parsons, as appropriate. Our employees shall be aware of these programs, receive adequate training, and perform their work consistent with these compliance programs.

The contractor shall list all relevant (and required) site-specific SH&E compliance programs.

The contractor shall identify the name and contact information for the person who is programmatically responsible for each SH&E compliance program.

The contractor shall attach the written compliance programs and all related information (e.g., safety data sheets, chemical inventory, equipment-specific lock-out/tag-out procedures), in a referenced and included appendix.

SH&E Compliance Training Matrix and Training / Education Processes

All workers, including managers and supervisors, shall receive competent and relevant site-specific SH&E training. This training shall include site-specific SH&E compliance training and general site training on SH&E best practices. Our employees shall be properly prepared for conducting their work and shall comply with the relevant SH&E programs and general site-specific SH&E practices.

A written training matrix shall be established and maintained that identifies the workers (by name or by title/role), all of the SH&E-related training they must have, and the frequency for refresher (if needed).

Training shall be provided:

- When the SSHEP is established;
- To all new workers;
- To all workers with new job assignments for which training has not been previously provided;
- When new substances, processes, procedures, or equipment are introduced to the workplace and represent a new hazard, potential exposure, or risk;
- When the employer is made aware of a new or previously unrecognized hazard, exposure, or risk;
- To familiarize supervisors with the SH&E hazards, exposures, or risk to which workers under their immediate direction and control may be exposed; and
- To all workers for hazards, exposures, or risks specific to their job assignment and in compliance with related SH&E compliance programs.

Workplace safety and health practices for all work locations shall include, at a minimum:

- An explanation of the SSHEP, the Parsons Project Safety, Health, and Environmental Plan (PSHEP), the site's emergency action plan and fire prevention plan, and the measures to report unsafe conditions, work practices, injuries, and/or a recognized need for additional instruction;
- The general purpose, availability, use, limitations, and disposal of outerwear and personal protective equipment;
- Locations of sanitation, hand-washing, and drinking water facilities;
- Provisions for medical services and first aid, including emergency procedures;
- Response procedures for environmental spills or releases; and
- Specific instructions to workers on hazards unique to their job assignment to the extent such information is not covered in other training.

The contractor shall attach its site-specific training matrixes here.

Site-specific Worker Orientation Program

All new workers on our jobsite shall receive site-specific orientation training before conducting their work. This training shall consist of SH&E compliance training and general site SH&E practices related to their work.

Employees completing orientation shall acknowledge in writing completing and understanding the site-specific orientation subject matter. Employees who do not understand one or more subjects shall be retrained.

The contractor shall attach the subject matter associated with site orientation.

Identification of Competent / Qualified Persons

The contractor shall list and submit certificate(s) demonstrating the formal competence of company personnel assigned to this contract. The contractor shall complete Contractor Competent Person certification forms for each designated competent or qualified person and submit them to the Parsons project manager prior to site mobilization. Refer to the form on the next page.

Contractor Competent Person Certification (United States)

Definition

A competent person is a formally-designated person having the ability to recognize existing and predictable hazards and has the authority to correct them.

Responsibility

The designated contractor competent person is responsible for recognizing and correcting SH&E risks/hazards. This person has the authority to stop work due to a perceived SH&E concern on the jobsite. This contractor manager and designated competent person are considered field contacts for Parsons projects.

This form shall be completed by each contractor manager and the contractor-designated competent person. ***Where a contractor is responsible for multiple crafts, it will be necessary to maintain additional designated competent persons and forms.*** Each contractor on a Parsons project shall submit this completed form to the Parsons project manager before beginning work on the project and must update it any time the designated competent person changes.

Acknowledgment

I, _____ representing, _____
Contractor Manager (Printed) **Contractor Company Name (Printed)**

have assigned _____ to be the competent person in the areas indicated and
Contractor Competent Person (Printed)

I acknowledge that this individual has been thoroughly trained, is experienced in hazard recognition, and has the authority to stop work and correct hazards in the event of a potential hazardous or imminent danger situation.

_____
Contractor Manager (Signature) **Date**

I acknowledge that I have been thoroughly trained and have the experience to perform the duties as the competent person in the areas marked below, and I understand that I have the responsibility and authority to correct hazards and to stop work in the event of a potential hazardous or imminent danger situation.

_____ _____
Contractor Competent Person (Signature) **Date**

(Check the areas in which the designated competent person is permitted to execute the role of Contractor Competent Person.)

☐	Air Pollution and Emissions	☐	Environmental Assessments	☐	Mechanical Demolition
☐	Asbestos	☐	Excavations and Trenches	☐	Protected Ecological and Cultural Resources
☐	Bolting, Riveting, and Fitting	☐	Fall Protection	☐	Resource Conservation
☐	Buried Items	☐	First Aid and CPR	☐	Respiratory Protection
☐	Concrete, Forms, and Shoring	☐	Hearing Protection	☐	Rigging
☐	Cranes and Derricks	☐	Ladders	☐	Scaffolding
☐	Demolition	☐	Lead	☐	Tunnels and Shafts
☐	Drinking Water	☐	Management of Hazardous Materials and Hazardous Solid Wastes	☐	Underground Construction
☐	Electrical			☐	Wastewater
☐	Emergency Response to Spills and Releases	☐	Marine Work and Diving	☐	Welding and Cutting
		☐	Material and Personnel Hoists		
☐	Other				

Hazard Identification, Notification, and Correction Process

Each employee is the critical leader for preventing injuries, illnesses, and adverse environmental impacts, Achieving SH&E excellence requires a personal commitment. Therefore, each employee is authorized to stop work immediately if a safety, health, or environmental concern exists or if the work is not going according to plan. Once work is stopped, each employee is expected to communicate the work stoppage to the other affected stakeholders and further evaluate the condition and adjust the work plan to resolve the safety, health, or environmental concern before restarting the work.

Each employee shall understand that he or she has the **authority** and the **responsibility** to stop work at any time when he or she notices an unplanned or unexpected issue that he or she believes will adversely affect the project's safety, health, or environmental risk. This concept is consistent Parsons SH&E core value.

There is no circumstance where retribution may be directed toward an employee who conscientiously exercised his or her stop work authority.

When should work be stopped? Here are some examples.

- An unsafe act is observed.
- An unsafe condition is observed in the work area.
- An incident or near miss occurs in the work area.
- There is an emergency.
- Alarms sound.
- There is a change in the planned work conditions.
- There is a change in the planned personnel associated with the work.
- There is a change in the planned in scope of work.
- A change is needed in the work plan.
- One or more personnel associated with the work task appear to be confused or demonstrate that they do not understand one or more parts of the work plan.
- Someone believes that personnel, the environment, facilities, or equipment, is exposed to an unacceptable level of risk.

Unsafe, unhealthful, or environmentally damaging work conditions, practices, or procedures shall be corrected in a timely manner based on the severity of the risk posed.

The contractor may change the words in this section. Parsons expects its contractors to maintain a working environment where all employees feel comfortable identifying hazards and risks, correcting them, and stopping work when a hazard or risk was not adequately controlled.

Specific Hazard and Risk Control Measures

Activities shall be evaluated by workers and other subject matter experts to determine the appropriate hazard and risk controls that shall be implemented when performing the activity. In most cases, formal activity hazard analyses (AHAs) shall be communicated and used; however, some activities may require more sophisticated risk management schemes.

The contractor shall list all relevant (and required) site-specific AHAs and other risk management measures that will be taken to manage the risks associated with the scope of work and the general risks and hazards identified in Section 4.

The contractor shall attach the actual AHAs, job aids, and risk management tools in a referenced and included appendix.

Integration of SH&E Risk Mitigation Planning in 2-Week Look-ahead Submissions

The risk mitigation 2-week look ahead form, below, will be used to plan integrated risk mitigation strategies at weekly progress meetings.

SH&E Risk Mitigation 2-week Look-ahead Form

SH&E Plan for Week Ending:		**Contractor:**	
Project/ Location:		**Meeting Date:**	
Plan Prepared by:		**Dated:**	

Next Two Weeks' Scope of Work:

Identified SH&E Risks/Exposures/Hazards Issues:

Identify Tasks requiring environmental construction permitting (e.g., stormwater permit) or involving other environmental regulatory issues (e.g., generation of new, uncharacterized waste):

Tasks with environmental risk of significant spills or releases:

Control Measures:

Additional Activity Hazards Analysis Required:

Contractors and Subcontractors Mobilizing/Demobilizing:

Audits/Inspections Scheduled:

Competent Person Changes:

Planned Orientation/Training:

Recommendations/Comments/Concerns:

Note: This information shall be incorporated into the meeting minutes.

The contractor may change these words or use another form, as long as the contractor strictly abides by the 2-week look-ahead process.

Employee Participation and Consultation

Open, two-way communication between the leadership team and line employees on SH&E issues is essential to an injury-free, productive, and environmentally sound workplace. The following system provides for the flow of SH&E information.

- Continually maintaining an environment where any worker can report SH&E concerns without any risk of retribution.
- A collaborative approach to resolving worker SH&E concerns, using worker knowledge and experience in developing appropriate risk control measures.
- New worker orientation, including specific orientation to SH&E policies and procedures
- Reviews of the SSHEP and the Parsons PSHEP
- Workplace SH&E training programs
- Regular SH&E meetings
- Posted or distributed SH&E information (awareness program)
- Procedures to anonymously inform SH&E management of workplace hazards, exposures, or risks
- An employee (or labor/management) SH&E committee that: 1) meets regularly and prepares written records, 2) reviews results of periodic scheduled inspections, 3) reviews incident investigations, 4) assesses work risk, 5) reviews reports of hazards, exposures, or adverse environmental conditions, and 6) makes suggestions to management to prevent future incidents.

The contractor may change the words in this section. Parsons expects its contractors to maintain a working environment where all employees feel comfortable identifying hazards and risks, correcting them, and stopping work when a hazard or risk was not adequately controlled.

Emergency Action Plan

The contractor shall attach its site-specific emergency action plan. Be sure it identifies specific assembly areas, describes the employee accountability procedures, and explains emergency communication methods. The emergency action plan also should include information on how employee accountability information is transmitted to Parsons and the name of the contractor employee responsible for maintaining the emergency action plan.

Site-specific Medical Emergency Plan

The contractor shall provide information on how emergency medical services are summoned, how emergency services provider will get to the injured or ill employee, the names and work locations of designated and trained first first-aid/CPR providers, and the process for managing non-emergency injury or illness cases where treatment beyond local first aid is needed.

Incident Reporting, Investigation, and Corrective Action Processes

The contractor shall provide information on how incidents are reported and investigated, and how corrective actions are implemented to prevent recurrence.

The contractor's incident reporting, investigation, and corrective action processes should include all or most of the following.

- *Responding to the scene of the incident as soon as possible*
- *Reporting immediately to the appropriate Parsons point of contact*
- *Interviewing injured workers and witnesses*
- *Examining the incident locations or workplace for factors associated with the incident*
- *Determining the cause of the incident*
- *Taking corrective action to prevent the incident from recurring*
- *Recording the findings and corrective actions taken*
- *Post-incident substance abuse testing*

Parsons expects its contractors to maintain a working environment where all employees feel comfortable reporting injuries and illnesses, without fear of retribution or peer pressure.

Work Site Inspection and Program Audit Process

Site SH&E inspections shall be performed by one or more knowledgeable employees prior to beginning work each day in areas where work will take place during the shift. Designated competent persons shall perform frequent inspections and assessments of the areas and activities under their oversight throughout the day. Deficiencies shall be corrected as soon as possible.

The superintendent or project manager shall perform documented weekly SH&E inspections of all work sites. Deficiencies shall be tracked to closure in a timely manner.

The following SH&E inspections shall be performed. Findings shall be tracked to timely closure.

The contractor shall complete this table for all programmed inspections, including compliance inspections. Rows may be added or deleted.

Competent Person / Inspector	Area of Responsibility	Frequency

The following compliance programs shall be reviewed and audited. Findings shall be tracked to timely closure.

The contractor shall complete this table for all SH&E program compliance reviews and audits. Rows may be added or deleted.

Reviewer / Auditor	Compliance Program	Frequency

Progressive Disciplinary Program

The contractor shall explain or attach its progressive disciplinary program.

Recordkeeping / Document Retention Processes

All records shall be maintained no less than 3 years beyond the end of the contracted work, unless a longer period of retention is required by a regulatory agency.

The contractor shall explain or attach its recordkeeping / document retention program. At a minimum, the contractor's recordkeeping and document retention program shall describe the following.

- *The information recorded for inspection, audit, and incident investigation findings.*
- *How inspection, audit, and incident investigation findings are accessed and preserved, and how corrective actions are tracked to closure, and how closure records are accessed and preserved.*
- *The information contained in SH&E training records.*
- *How training records are accessed and preserved.*
- *The information contained in industrial hygiene and medical monitoring records.*
- *How industrial hygiene and medical monitoring records are accessed and preserved.*
- *How compliance programs and other programmatic documents (including safety data sheets) are accessed and preserved.*

ATTACHMENT E

HONEYWELL CONTRACTOR SAFETY HANDBOOK

Honeywell Contractor Safety Handbook

This informational Handbook is intended to provide a generic, non-exhaustive overview of a particular standards-related topic. This publication does not itself alter or determine compliance responsibilities, which are set forth in OSHA standards themselves and in the Occupational Safety and Health Act of 1970. Since the regulations, interpretations and enforcement policy may change over time, it may be necessary to seek additional guidance on OSHA compliance requirements. Any and all deviations from the guidelines and rules set forth in this Handbook shall have prior approval by Honeywell.

This Handbook serves as a guide and reference for the minimum rules and standards for contractors performing capital work, maintenance, repair, dismantlement, remediation or other activities that have the potential for an incident.

This Handbook should be issued to each contract employee working at a Honeywell facility, location or site. The perforated page at the back of the Handbook must be signed and returned to the Honeywell contact/representative prior to commencing work. After reviewing each Section of this Handbook, specific attention should be focused on the topics that will be encountered during the project/task.

Contract employees must also be familiar with their company's health, safety and environmental policies, procedures and guidelines.

Revised 12/99

Contractor Safety Excellence

Our Mission

We will achieve a premier level of safety performance for contractors working at Honeywell locations through increased safety awareness, communication of expectations, following work processes that reduce at-risk behaviors and ensuring the proper management of incidents.

Our Commitment

We recognize that outstanding safety performance is essential to the welfare of our employees, contractors and to business excellence. We will continue to improve our global competitiveness by making safety an integral part of all business activities.

Our Safety Principles

- We strive to prevent all incidents that may lead to injuries or illnesses.
- Safety performance is a responsibility of line management and every contractor.
- We design safety into the work place.
- Individual behavior is the most important factor in preventing incidents.
- We expect and require every contractor to work safely.
- Working safely is good business.
- Safety is an integral part of our culture and total quality processes.
- Our safety process must react to all incidents, not just accidents.
- We continually improve our safety process by auditing the process and correcting the root cause of deficiencies.
- We promote safety, both on and off the job.
- We prepare for emergencies.

Table of Contents

A. Introduction

- This handbook sets forth the safety requirements of Honeywell International Inc. ("Honeywell")
- At Honeywell, it is our policy to provide a safe and healthful place in which to work. It is everyone's obligation to work safely and to correct unsafe acts, practices and/or conditions for the protection of yourself and others.
- It is extremely important that you understand how your work is to be done in a safe manner. If you don't know, stop and ask before you begin work.
- All work must conform to plant, local, state, and federal (OSHA) regulations (CFR 29 Part 1910 and 1926).
- The information in this handbook is general in nature and is to be considered the minimum.
  S ave
  A ll
  F ellow
  E mployees
  T his
  Y ear
- During your orientation, you will be informed of the specific safety requirements for your particular site or plant.

B. General Information

Site Entry

- Personnel, vehicles, and equipment are subject to search upon entering or exiting the site premises.
- Personnel may be required to pass a drug test or show proof of passing a drug test within the past thirty (30) days prior to working at the site.

Vehicle Safety

- Operators of vehicles and equipment shall observe all site traffic regulations. Seat belts are to be worn at all times.

Pedestrians

- Pedestrians have the right of way. Pedestrians should use walkways where provided and should not take shortcuts through operating areas, buildings or other areas.

Cameras

- Cameras are not allowed on site without the proper authorization.

Running

- Running is not permitted on site except in an extreme emergency.

Smoking

- Smoking is permitted in designated areas only. Discard smoking materials in approved containers.

Conduct

- Horseplay, fighting, gambling, sexual harassment and the possession or use of firearms, alcoholic beverages and illegal substances is strictly prohibited.

Dress Code

- Pants must cover top of steel-toed leather work shoe and be in good condition. Shirts must have at least 4" of sleeve. Long sleeve shirts may be required at specific locations or for certain tasks.

C. Emergency and Disaster Procedures

In the event there is an emergency, anyone can activate
the alarm any time there is a:

- Serious injury or illness
- Fire
- Major spill or release

When an alarm sounds, the following rules are in effect:

- All flame or hot work permits for welding, cutting, and spark producing equipment will be suspended until the all-clear signal is given.
- Smoking is prohibited.
- All traffic will pull to the side of plant roads and shut off engines until the all-clear signal is given.
- Report to your assembly point / area (if previously designated), or contact your Honeywell host.

Site Specific Emergency and Disaster Procedures

- Each Honeywell plant is equipped with an emergency alarm system, designated assembly areas and emergency phone numbers. The specific guidelines for reporting emergencies and disasters should be determined in your orientation.

D. Personal Protective Equipment (PPE)

Head Protection

- Contractors are required to wear approved hard hats that meet ANSI Z89.1-1971. Hard hats must be in good condition and be worn with brim to the front.

Eyes and Ears

- Each employee should know the location of the nearest eye wash/safety shower station in their area before starting work.
- Contractors are required to wear approved ANSI Z87.1 safety glasses with rigid side shields. Additional eye/face protection will be required when performing certain tasks (e.g.: welding, burning, grinding, chipping, sawing, drilling, handling chemicals or corrosive liquids, and pouring concrete or molten materials.) Check plant procedures.
- Approved hearing protection must be worn as specified in all posted areas and while working with or around high noise level producing tools, machines or equipment.

Fingers, Hand and Wrist

- Gloves suitable for the job being performed shall be worn unless the job cannot be done with gloves or wearing gloves increases the hazard.
- Tool holders should be used when driving stakes and wedges or when holding star drills, bull pins or similar tools.

Foot Protection

- In accordance with OSHA 1910.136, all contractors must determine if hazards are present (or are likely to be present) that may require the use of safety footwear.
- Safety footwear for contractors must be in accordance with ANSI Z41-1991, constructed of industrial quality leather and without urethane soles.
- Rubber boots with safety toe protection are required on jobs subject to chemically hazardous conditions.
- Metatarsal protection should be worn when using jack hammers, tamps and similar equipment which has the potential for foot injury above the toes.

Respiratory

- Respirators used by contractors must meet NIOSH/MSHA standards.
- Respirators must be inspected regularly and stored in a dust-free container.
- Employees required to wear a respirator must have a physician's approval and be fit tested. Employees must be clean shaven in the facial area to obtain an acceptable seal.
- Contractor must keep records of qualified users.

Skin

- If the possibility of skin contact with chemicals exists, personal protective equipment required by Material Safety Data Sheets shall be worn.

E. Hazard Communication / Right To Know

Upon beginning work at a Honeywell facility, each individual has the right to know information concerning the hazardous properties of any materials he/she may come in contact with. Training regarding potential hazards must be given to each individual and will include, but not be limited to, the following:

- An explanation of the hazard communication standard and the training requirements.
- An explanation of the project hazard communication program and it's location.
- Notification of the locations of the hazardous

chemicals.
- A description of the plant labeling and hazard rating system.
- A description of the Material Safety Data Sheet (MSDS), their use and location.

F. Permits

Certain types of work are not to be started until approval is given in the form of a signed permit. A written, properly authorized permit listed below may be required before you begin any activities in any production or operating area of the plant.

- **Work Permit** - required before any work can be started on any job in any area of the plant.
- **Line Breaking Permit** - required before breaking screwed, flanged, welded or other type joints on pipelines or vessels containing hazardous materials, or breaking into (disconnecting, drilling, sawing, etc.) non-hazardous materials under pressure.
- **Confined Space or Vessel Entry Permit** - required before entering tanks, vessels, manholes or similar confined spaces that have been in service or connected to operating process equipment and may contain potentially hazardous atmospheric conditions.
- **Lockout / Tagout Permit** - required for the service and maintenance of machines and equipment in which the *unexpected* energization or start up of the machines or equipment, or release of stored energy could cause injury to workers.
- **Excavation Permit** - required to minimize hazards during excavation work and ground breaking operations, specifically when a machine or hand tools are used at a depth greater than one foot. Excavations greater than four foot in depth must be inspected and approved by a competent person and have a Confined Space permit before access by personnel.
- **Hot Work Permit** - required before any flame or spark producing activity can begin in any production, operating, or some construction areas of the plant. This includes, but is not limited to:
  - Welding / Repair of pipe lines under pressure greater than 5 PSI.
  - Welding / Repair of pipe lines containing hazardous or flammable materials.
  - Welding / Repair on any pressure vessel, fired or unfired, under pressure or in the presence of hazardous or flammable materials.
  - Work on energized circuits.
  - Cutting / Burning of pipe lines, vessels, equipment, etc. that may have contained any hazardous material.
  - Grinding
  - Any hot work on carbon steel pipe lines, vessels, equipment, etc. that may have contained sulfuric acid will not be permitted without extensive review with project and plant personnel due to the possible generation of hydrogen gas.

  Each plant may have permits that are required for other specific work procedures. Check with your supervisor for these permits.

G. Fall Protection

- 100% fall protection (i.e. two lanyards when moving in certain areas) is required for all work above six (6) feet.
- Safety full body harnesses must be arranged so the d-ring is in the rear.
- Safety belts are not to be used for support or as a lineman's belt.
- Lanyards must be secured to an anchorage point overhead that can support 5,000 lbs. using as short a line as possible, not to exceed five (5) feet..
- All fall protection equipment shall be inspected by the user prior to each use.
- Lanyards may not be tied-off to any pipe/conduit less than 2" in diameter.
- Safety harnesses shall be worn and tied off when performing work on the following:
  - Sloped roofs
  - Flat roofs without handrails, if within 6 feet of the edge of the roof or opening
  - Any suspended platform or stage
  - All scaffolding six (6) feet above supporting work surface
  - When working on the sixth step or higher

on a ladder
- Ladders near the edge of roofs or floor openings
- Any unguarded areas six (6) feet above any supporting work surface
- An aerial lift.

H. Barricades, Signs, and Floor Openings

All floor openings/penetrations (i.e. holes > 2") must be properly covered or guarded. Barricades and signs must be posted when working in or around the following:

- All manlifts and the immediate working area.
- In ceilings, pipe bridges, etc.
- Removing roofing panels, walls, etc.
- Swing radius of cranes and the area where the lift will be made and moved to.
- Any open excavation.
- Any confined space entry.

Types of Barricades

- Warning barricades call your attention to a hazard but offer no physical protection. Examples: yellow, red, blue synthetic tape on stands or posts, plastic, or wooden snow fence.
- Protective barricades warn and provide physical protection and shall withstand 200 lbs. of force in any direction with minimal deflection (3"). Examples: wood post and rail, cable and wood post and chain.

Guidelines

- Barricades shall be 42 inches high and maintained square and level.
- Barricades shall be erected before any work begins.
- Blinking lights must be used on road blocks after dark.
- An access opening or gate should be provided where practical.
- Barricades and signs shall be fully informative, legible, and visibly displayed.
- Barricades and signs shall be removed when no longer needed.

Hole Covers

- Must be installed immediately.
- Hole covers or barricades are required at any floor elevation.
- Material and equipment must not be stored on a hole cover.
- Must be secured to prevent movement and be marked with the word "HOLE" or "COVER".
- Must extend adequately beyond the edge of the opening (i.e. 3") and must not be more than 1" high.
- 3/4" plywood will be used providing the opening is less than 18". For any opening greater than 18 inches, 2 inch lumber of doubled ¾ inch plywood is required.

I. Ladders and Scaffolds

- Inspect ladders before use - identify defective ladders with "Do Not Use" tag.
- Only a "Type I" ladder with a minimum rating of 250 lbs. is acceptable.
- Metal ladders are prohibited.
- Fall protection must be worn when working on the sixth step or higher.
- When ascending and descending a ladder, face the approved side of the ladder, use at least one hand to grasp the ladder, and do not carry tools or materials in your hands.
- *All* ladders shall have a tie-off rope, non-skid safety feet and be tied-off.
- Never work off a ladder where the midpoint of the body (i.e. belt buckle) must be extended beyond the side rails.

Straight or Extension Ladders

- Follow the 4-to-1 rule when using an extension or straight ladder - position the base of the ladder one (1) foot from the supporting structure for every four (4) foot in height.
- If a ladder is used to reach a higher platform, the top of the ladder must extend three (3) feet past the platform.
- Do not work off of the top three (3) rungs of any straight or extension ladder.

Step Ladders

- Step ladders shall be set with all four (4) feet level.
- Ladders used in traffic areas must be secured or barricaded to prevent displacement.
- Never work off of the top two steps of step ladder.
- Never stand or sit on top of step ladders.

Scaffolding

- All scaffolds must conform to the OSHA Standard (Subpart L)
- All scaffolds are to be erected level - plumb on a firm base.
- When space allows, all scaffolds must be equipped with access ladders that extends three (3) feet past the landing gate. At landings, 42" high handrails rigidly secure, 21" high mid-rails rigidly secure, completely decked with safety planking or manufactured scaffold decking and rigidly secured toeboards on all four sides.
- A competent person must determine the feasibility and safety of providing fall protection for employees erecting and dismantling scaffolds, and train those employees accordingly.
- All scaffolds shall have a tag attached, completed by the competent person, stating what type of fall arrest system is required.
- All personnel working on scaffolds must be trained by a qualified person in the subject matter to recognize the hazards associated with the type of scaffold being used and the nature of any hazards (i.e. electrical, fall, falling objects, etc.).
- Retraining must be provided where inadequacies in an affected employee's work practices involving scaffolds are observed.
- Safety harness and tie-off required when working from scaffolding over one buck high.
- Personnel shall not climb or do any rigging from a scaffold, handrail, mid-rail or braces.
- No one may alter any scaffold member by welding, burning, cutting, drilling or bending.
- Scaffolds shall be tied off or stabilized with outriggers when its height exceeds three times the smaller dimension of its base, but tie-offs must not exceed 26 feet vertically.
- Scaffolds must be tied off horizontally every 30 feet.
- No one shall ride on a rolling scaffold when it is being moved. All tools and materials shall be removed or secured to the decking before moving the scaffold.

J. Housekeeping

Good housekeeping plays a key role in preventing accidents and fires. Good housekeeping is emphasized as a vital safety measure.

- Keep everything in its proper place - store materials and equipment in a safe and orderly manner.
- Put trash, scrap materials and other waste in the proper containers.
- Clean up tools and work areas as your job progresses - do not wait until the end of the work day.
- Keep the floor of the work area clear of tools, cords, and scrap materials.
- Insure that work tables are occupied only by work at hand and tools required for work being done.
- All work areas are to be left in orderly and clean condition at the end of each work day.
- Keep cords and hoses at least seven (7) feet overhead over walkways and work areas or lay them flat outside of walkways.
- Maintain clear access to all work areas. Do not block fire extinguishers, emergency equipment, electrical boxes or panels, or other safety/fire equipment.

K. Tools - Hand and Power

- Do not operate any tool without proper instruction.
- Only qualified persons are to use tools and equipment.
- Honeywell tools and equipment are not to be used by contractors.
- Do not use any tool or equipment for any purpose other than that for which it was designed.
- Personal tools are subject to inspection at any time.

- It is your responsibility to inspect all tools prior to each use. Do not use a tool that is deemed defective. Report and tag all defective tools.
- Do not lift electrical tools by the cord.
- Tools may be inspected and marked with color-coded tape each month. Check with your Supervisor for designations and do not use a tool without the appropriate color-coded tape.

Hand Tools

- Worn tools are dangerous! Replace or repair the tool.
- Every tool was designed to do a certain job. Use a tool for its intended use only.
- Tools subject to impact (chisels, star drills and caulking irons) tend to "mushroom." Keep them dressed to avoid flying spalls. Use tool holders.
- Don't force tools beyond their capacity or use "cheaters" to increase their capacity.

Power Tools

- Material should be secured when power tools are applied to it.
- Each power tool should be examined for damaged parts, loose fittings, and frayed or cut electrical cords before use.
- Portable electrical equipment and tools shall be grounded unless "double insulated." A ground fault circuit interrupter (G.F.C.I.) shall be used for working in damp areas when using permanent plant power or as otherwise required.
- Electrical cords shall be unplugged and air lines deactivated and bled down before adjusting, servicing, repairing, or changing bits and blades in electrical or pneumatic tools.
- Any pneumatic hoses exceeding ½ inch in diameter shall have a safety device at the source of supply or branch line to reduce pressure in case of hose failure. All hose connections shall be properly secured.
- All tools shall be used with the correct shield, guard, or attachment recommended by the manufacturer.
- Only licensed and qualified personnel shall be allowed to operate power-actuated tools.
- Power tools should be unplugged when not in use.

L. Mobile Equipment

- Anyone who operates any mobile equipment (cranes, manlifts, pick-ups, forklifts, etc.) must demonstrate knowledge and competency for each make of equipment.
- All equipment will be inspected daily before use to insure it is in proper operating condition. If the equipment becomes defective in any way, notify your supervisor at once and place a "DANGER - DO NOT USE" tag on it.
- All equipment is to be supplied with seat belts, back-up alarm and fire extinguishers (back-up alarm is not required on pickup trucks.)
- Use of gas/diesel equipment inside operating building is prohibited unless approved by the Safety Department.

M. Cranes

- All operators must be certified and licensed to operate each make and model of crane.
- The operator is solely responsible for the safe operation of the crane.
- The operator has full responsibility for the safety of a lift and may not make a lift until safety is assured.
- A copy of the load chart, manufacturer's operators' manual and inspection record must be in the crane cab or on project site.
- All cranes and the immediate work area must be barricaded at all times.
- No load shall be swung over any persons.
- Outriggers must be leveled and fully extended when making a lift.
- No part of the crane, load, hoist (load and boom) lines, boom and tag line shall come within 10 feet of energized electrical lines.
- For pick and carry operations, consult the manufacturer's operator manual.
- Riding on crane hooks and/or "headache" balls is prohibited.
- Operators are not permitted to leave the crane while holding a live load.

- The use of suspended personnel platforms (crane baskets) must meet all OSHA requirements. The use of a crane or derrick to hoist employees on a personnel platform is prohibited unless all requirements of 1926.550 (g) are met. A company plan and check list must be used.
- A lift plan is required for any critical lift.
- Lifting in high winds (e.g. greater than 20 mph) is not recommended.

N. Material Handling Equipment

- All material handling machines must have backup alarms, horns, rollover protection structures and seat belts when provided by manufacturer.
- The operator must be trained to operate each make and model of machine.

O. Personnel Lifting Equipment

- The operator must be trained to operate all personnel lifts.
- All employees are to have a safety belt or safety harness on and tied off when working out of: manual personnel lifts, power platform lifts, scissors lifts, high-reach lifts, etc.
- Tie-off shall be made to the lifting equipment.
- Personnel are not to get under lifts.
- When exiting the lifting equipment onto a proper working elevated platform, the employee must be tied off to that platform immediately prior to, and during, that exit.

P. Cars, Pickups, and Trucks

You must have a valid driver's permit to operate any vehicles on plant property. You must obey the following rules:

- Wear your seat belt.
- Obey plant speed limits and stop signs.
- Motors must be shut-off when refueling.
- Stop at all railroad crossings.
- No more than three (3) people on a front bench seat, two (2) people if bucket seats.
- Mount and dismount the vehicle only when it is stopped.
- Keep arms, feet and bodies inside the vehicle.
- Look to the rear and sound your horn before backing up.
- Inspect the vehicle each day before use.
- Riding in the rear of a truck is prohibited unless approved seating with seat belts has been provided.

Q. Rigging

- All personnel who perform or assist in rigging operations shall have received appropriate training and be competent.
- Only ONE eye in a hook. Use a shackle to hold two (2) or more eyes.
- Tag lines are required to control lifted loads made by mechanical equipment. Never put hands on a load or wrap tag lines around your hands or body.
- Never raise a load over other people.
- Know the capacities of the rigging equipment and the weights of the loads.
- Never rig from any structural member until you are sure it will support the load.
- Never use plate grips, tongs, pipe clamps, etc. as substitutes for beam clamps.
- Two slings will be used unless impractical. If one sling is used, double wrapping is required.
- Continuous synthetic slings may be used only when heat or chemicals are not a factor, and where load permits.
- Flat nylon straps should not be used for erecting steel. Wide nylon straps may be used for lifting tube bundles, fiberglass ducts or other material that could be damaged by a metal sling. The use of flat nylon strap with any visible tear or defect is strictly prohibited.
- Steel slings should be used where heat or chemicals are a potential factor. The use of steel slings with damaged strands or other defect is strictly prohibited.
- The use of a come-a-longs with cracked or damaged handles is strictly prohibited.
- Chainfalls and come-a-longs must have OSHA approved safety spring return latches on all hooks.
- Daily, weekly, and monthly inspection records will be kept by the contractor.

R. Chain Falls and Hoists

- Inspect hoists daily (operations), monthly (maintenance) and annually (3rd party vendor).
- A chain hoist must be used within its rated capacity, marked on the equipment.
- Do not leave an unsecured and unattended load hanging on a hoist or chain fall.
- Do not stand or have any part of the body below a load suspended on a chain hoist.
- Do not wrap the load chain around the load to be lifted.
- Use of "cheater bars" is strictly prohibited.
- Use a shackle to connect straps to a hook.

S. Fire Protection and Prevention

- Be sure to locate the nearest fire extinguishers in your work area before starting work.
- As warranted by the project, a trained and equipped fire fighting organization (Fire Brigade) will be provided to assure adequate protection of life.
- All fire hydrants, fire extinguishers, fire blankets, etc. shall be clearly marked and not obstructed.
- Combustible materials shall be kept away from steam lines, radiators, heaters, hot process and service lines.
- For any job requiring hot work or open flame or welding, a fire extinguisher must be within 20 feet of where the work is taking place.
- Fire extinguishers shall be checked daily before starting work.
- Portable power equipment must not be refueled while running or when hot. Attach the ground wire before refueling.
- Store flammables in properly labeled metal type containers and in designated areas.
- Fire blankets must be used to protect equipment, control panels, instrumentation, etc. when welding, cutting, burning, or grinding overhead.
- "Borrowing" plant fire extinguishers is not permitted.

T. Material Handling / Stability Control

Proper material handling and stability control insures that personnel, material, and equipment are safe from unexpected movement such as falling, slipping, rolling, tripping, or any other uncontrolled motion.

- Clean up ragged metal edges.
- Pull all protruding nails and wires or bend them flush.
- Set on dunnage for ease of handling.
- Check all material and equipment to prevent rolling.
- Tie down all light, large-surface-area material that might be moved by the wind.
- Put absorbent on all grease and oil spills immediately and clean them up. Notify proper plant personnel of spills if significant.
- Salt or sand icy walk areas immediately.
- Use proper lifting techniques when moving material by hand.
- Know the weight of the object to be handled.
- Protect the area around and below you.

U. Welding and Burning

General

- Before beginning any flame or spark producing operations in the plant, check with your supervisor about any permits that may be required. Follow the requirements on the permit.
- Keep welding leads and burning hoses clear of passageways.
- Each welder is responsible for containing sparks and slag and/or removing combustibles to prevent fires. The welder is also responsible for making sure there is a fire watch and a good fire extinguisher for the duration of the operation.
- Provide adequate screens to protect vision of general public.

Welding - Electric

- All work must have a separate and adequate ground.
- Welding rods are not to be left in the electrode holder when not in use. Stub ends are to be put in proper containers - not on the floor.

- All weld arcs shall be shielded.
- All welding machines are to be shut off when not in use.
- Hard hats with the brim to the front must be worn during welding operations by the welder.
- An approved welding shield must be worn. Use no less than a No. 10 filter plate with safety plate on both sides of the filter plate.
- Powered welding machines should be operated in well ventilated area only and will be diesel fueled only, unless otherwise approved by safety.

Burning - Gas

- The operation of oxygen and fuel gas burning equipment shall only be done by trained and experienced personnel.
- Do not exceed 15 P.S.I. on the torch side of the gauge when using acetylene.
- Only an approved spark lighter should be used to light a burning torch. Do not use matches, cigarettes, lighters or hot work.
- Always clean burning tips with the proper type cleaner.
- All burning rigs must be broken down at the end of the shift with regulators removed and caps screwed down hand tight.
- Approved burning goggles must be worn and No. 4 lenses or darker must be used.
- Keep oil and grease away from oxygen regulators, hoses and fittings. Do not store wrenches, dies, cutters, or other grease covered tools in the same compartment with oxygen equipment.
- Compressed gas bottles shall be kept in bottle carts or secured in an upright position. They must be transported and stored in a secured, upright position with protective caps in place.
- Oxygen and acetylene compressed gas bottles should not be stored together. They must be stored a minimum of 20' apart or have a 5 feet high, 30 minute rated fireproof wall between the two bottles.
- All gauges, hoses, and torches should be inspected on a regular basis. A back flow preventer is required on all regulators.
- When in use, place cylinders and hoses where they are not exposed to sparks and slag from the burning operation.

- Any hot work on carbon steel pipe lines, vessels, equipment, etc. that may have contained sulfuric acid will <u>not</u> be permitted without extensive review with project and plant personnel due to the possible generation of hydrogen gas.
- Handle cylinders with care.
- Lift to upper levels with approved carts only.
- Do not strike an arc on cylinders.
- Do not use cylinders as rollers.
- Do not lift with slings or by the protective cap.

Protective Clothing

- Only cotton, woolen, leather or special fire retardant synthetic clothing should be worn when burning or welding. Synthetics are very flammable and melt and cause more serious burns when exposed to flames and high temperatures.

<u>V. Steel Erection</u>

General

- 100% tie-off is required at ALL times
- Containers shall be provided for storing or carrying rivets, bolts and drift pins, and secured against accidental displacement when aloft.
- A load shall not be released from the hoisting line until the members are secured with not less than two bolts, or equivalent at each connection and drawn up wrench tight.
- Tag lines are required for controlling loads.
- When bolts, drift pins or rivet heads are being knocked out/off, means shall be provided to keep them from falling.
- Impact wrenches shall be provided with a locking device for retaining the socket.

W. Accident / Incident Investigation

- Notify Honeywell personnel (project engineer, plant safety, construction safety, etc.) immediately after any injury (medical treatment and first aid cases), equipment or property damage, environmental excursions, or near-miss incidents.
- A Honeywell Contractor Incident Investigation Report shall be completed by the contractor company immediately upon knowledge of the incident.
- The report may be completed by an investigation team headed up by the contractor company, and assisted by the Honeywell project manager / engineer, site safety leader, the individual(s) involved and any other necessary personnel. All sections of the report are to be completed, signed and dated.

X. OSHA Reference Guide

Subject	Reference
Barricades	Subpart G - 1926.202 Barricades
Cars, Pickups & Trucks	Subpart O - 1926.601 Motor Vehicles
Chain Falls	Subpart H - 1926.251 Rigging Equip. for Mat. Handling
Compressed Gases	Subpart H - 1910.101 General Requirements
Concrete & Masonry	Subpart Q - 1926.700 Scope, Application & Requirements
Confined Space Entry	Subpart J - 1910.146 Permit-Required Confined Spaces
Cranes	Subpart N - 1926.550 Cranes & Derricks Subpart N - 1910.179 Overhead & Gantry Cranes
Demolition	Subpart T - 1926.850 Preparatory Operations
Egress	Subpart C - 1926.34 Means of Egress Subpart E - 1910.35 Definitions
Electrical	Subpart K - 1926.400 Introduction Subpart S - 1910.301 Introduction
Emergency Procedures	Subpart C - 1926.35 Employee Emergency Action Plans Subpart D - 1910.38 Employee Emergency Plans
Excavations	Subpart P - 1926.650 Scope, Application & Definitions
Eye Protection	Subpart E - 1926.102 Eye and Face Protection Subpart I - 1910.133 Eye and Face Protection

Subject	Reference
Fall Protection	Subpart E - 1926.104 Safety Belts, Lifelines & Lanyards Subpart M - 1926.500 Scope, Application & Definitions
Fire Protection	Subpart C - 1926.24 Fire Protection and Prevention Subpart F- 1926.150 Fire Protection Subpart L - 1910.155 Scope, Application & Definitions
First Aid	Subpart C - 1926.23 First Aid and

	Medical Attention Subpart D - 1926.50 Medical Services & First Aid Subpart K - 1910.151 Medical Services & First Aid
Floor Openings	Subpart M - 1926.502 Fall Protection Criteria & Practices Subpart D - 1910.23 Guarding Floor and Wall Openings
Foot Protection	Subpart E - 1926.96 Occupational Foot Protection Subpart I - 1910.136 Foot Protection
Hand Protection	Subpart I - 1910.138 Hand Protection
Hazard Communication	Subpart D - 1926.59 Hazard Communication
Hazardous Waste	Subpart D - 1926.65 Operations & Emergency Response Subpart H - 1910.120 Operations & Emerg. Response

Subject	**Reference**
Head Protection	Subpart E - 1926.100 Head Protection Subpart I - 1910.135 Head Protection
Hearing Protection	Subpart E - 1926.101 Hearing Protection Subpart G - 1910.95 Occupational Noise Exposure
Hoists	Subpart N - 1926.552 Mat. Hoist, Personnel Hoist & Elev.
Housekeeping	Subpart C - 1926.25 Housekeeping
Illumination	Subpart D - 1926.56 Illumination
Incident Investigation	Honeywell Contractor Near Miss/ Incident Investigation Report.
Ladders	Subpart X - 1926.1053 Ladders Subpart D - 1910.22 General Requirements
Lockout/ Tagout	Subpart K - 1926.417 Lockout and Tagging of Circuits Subpart J - 1910.147 Control of Hazardous Energy
Material Handling Equip.	Subpart O - 1926.602 Material Handling Equipment
Materials Handling	Subpart H - 1926.250 General Requirements for Storage
Mobile Equipment	Subpart O - 1926.600 Equipment
Permits	Per Site Specifics. Check With Your Site Contact.
Personal Protective Equip.	Subpart C - 1926.28 Personal Protective Equipment Subpart E - 1926.95 Criteria for Personal Protect. Equip.

	Subpart I - 1910.32 General Requirements

Subject	**Reference**
Personnel Lifting Equipment	Subpart L - 1926.453 Aerial Lifts Subpart N - 1926.552 Personnel Hoist & Elevators Subpart F - 1910.68 Manlifts
Respiratory Protection	Subpart E - 1926.103 Respiratory Protection Subpart I - 1910.134 Respiratory Protection
Rigging	Subpart H - 1926.251 Rigging Material Subpart N - 1910.184 Slings
Sanitation	Subpart D - 1926.51 Sanitation Subpart J - 1910.141 Sanitation
Scaffolds	Subpart L - 1926.451 Scope, Application & Definitions Subpart D - 1910.28 Safety Requirements for Scaffolding
Signaling	Subpart G - 1926.201 Signaling
Signs	Subpart G - 1926.200 Accident Prevention Signs & Tags Subpart J - 1910.145 Specifications for Signs & Tags
Stairways	Subpart X - 1926.1050 Scope, Application & Definitions
Steel Erection	Subpart R – 1926.750 Steel Erection
Tools - Hand & Power	Subpart I - 1926.300 General Requirements Subpart P - 1910.241 Definitions
Training & Orientation	Subpart C - 1926.21 Safety Training and Education Per Site Specifics. Check With Your Site Contact.
Ventilation	Subpart J - 1926.353 Ventilation and Protection Subpart G - 1910.94 Ventilation
Welding & Burning	Subpart J – 1926.350 Welding & Cutting Subpart Q - 1910.251 Definitions

Y. Acknowledgement Page - Read Carefully Before Signing Below

This is to acknowledge that I have received my copy of the Honeywell Contractor Safety Handbook and an orientation on its contents as well as other project rules and policies. I will read and abide by all rules and regulations in the handbook and any additional rules and regulations of my job. I understand that working safely, complying with and obeying any and all Company and Honeywell safety rules, regulations or standards is a condition of employment. Should I not comply with Company and/or Honeywell safety rules, regulations or standards, I am subject to disciplinary action including removal from the site and possible termination of employment. In consideration of my employment, I further agree that my employment and compensation can be terminated at any time, with or without cause or notice, at the option of either the Company or myself. I understand further that this handbook and the rules and regulations it contains do not in any way constitute a contract (either expressed or implied) of employment between the Company as my employer and me for any indefinite or specified period of time. The Company reserves the right to change its policies as summarized herein.

_____ _____

Print Full Name Signature

_____

Contractor Company Name

_____
Craft

_____
Honeywell Contact/Representative

_____
Date

Note: The perforated last page and the back cover of this booklet contain the same wording. After properly endorsed, the perforated page is to be removed and given to the Honeywell contact/representative.

Rev. 12/99

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Date

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Rev. 12/99

* To be completed by the Contractor Company with assistance from Honeywell personnel

Date Incident Reported:	Honeywell Location:		Honeywell Contact:	
Date of Incident:	Time of Incident:	Name of Contractor Company:		
Name of Individual(s) Involved w/Incident:		Name of Injured Worker (if applicable):		Name of Supervisor/Foreman:
If an Individual was Injured, were they working under the direct supervision of Honeywell?		Age of Individual Involved:	Job Classification/Title/Craft:	
Length of Work Experience at Job Classification:		Length of Employment with Company:		Length of Time Working at Site:
Was the Individual Involved with the Incident Performing their Regular Job? If "No", explain why:		Date of Site Safety Orientation:		Last Formal/Documented Safety Meeting Attended:
Hours Worked that Day/shift Prior to the	Hours Worked that Week Prior to the Incident:	Consecutive Days/Shifts Worked Prior to the Incident:		Last Day Off Prior to the Incident:
Description of incident according to the individual(s) involved or injured (including what happened and how the incident occurred):				
According to the individual(s) involved with the incident or injured, what could have been done differently to prevent this incident from occurring? Why weren't these done prior to the incident?				
Describe any First Aid or Medical Treatment Provided On Site and/or at a Medical Facility. **NOTE: Any follow-up treatment at a later date must be communicated to Honeywell (Contractor Safety Leader).**				
Date that the Injured Individual Returned to Work?	Any Work Restrictions or Lost Time? If "Yes", describe: **NOTE: Any work restrictions or lost time at a later date must be communicated to Honeywell (Contractor Safety Leader).**			
Was there any Property Damage? If "Yes", describe:				

Contractor Supervisor/Foreman should complete the information below with an Investigation Team

Team Investigation – List the Possible Causes of the Incident Below.
For Each Possible Cause Listed Above, Reply "Why" or "Why not" the Cause Occurred.
Corrective Action(s) Taken - List Person(s) Responsible and Target Date:
Contractor Investigation Team - Leader & Members:

Date Incident Reported:	Honeywell Location:	Honeywell Contact:
Approval (Individual Involved/Injured):	Title:	Date:
Supervisor Approval (Print Name):	Title:	Date:
Honeywell Site Approval (Print Name):	Title:	Date:

HONEYWELL

01620 EXHIBIT 1
MOTOR VEHICLE ACCIDENT REPORT

Report #:_____

DATE OF ACCIDENT_____ DAY OF WEEK_____ TIME_____

LOCATION OF ACCIDENT_____

ACCIDENT INVOLVED: Employees, contractors, visitors, Vehicle vs. Vehicle, Vehicle vs. Property, Vehicle vs. Pedestrian

VEHICLE NO. 1		VEHICLE NO. 2 (or Pedestrian Info.)
	DRIVER'S NAME	
	STREET ADDRESS	
	CITY AND STATE	
	DRIVERS LICENSE NO.	
	PHONE NO. OR EXT.	
	OWNER'S NAME	
	STREET ADDRESS	
	CITY AND STATE	
	PHONE NUMBER	
	VEHICLE TYPE	
	MAKE, MODEL, YEAR	
	LICENSE PLATE	
	VEHICLE DAMAGE	
	PASSENGERS	
	VEHICLE REMOVED TO (auth.)	

INJURED (type, where taken):_____

POLICE DEPARTMENT/REPORT #:_____

WEATHER:_____

ROAD CONDITION:_____

ESTIMATED SPEED OF VEHICLE 1:_____ VEHICLE 2:_____

VEHICLE DEFECTS RELATING TO ACCIDENTS (Brakes, Lights, Tires, Steering)

VEHICLE 1:_____ VEHICLE 2:_____

STATEMENT DRIVER VEHICLE 1:_____

_____

_____

_____

STATEMENT DRIVER VEHICLE 2:_____

_____

_____

_____

INVESTIGATOR'S COMMENTS:_____

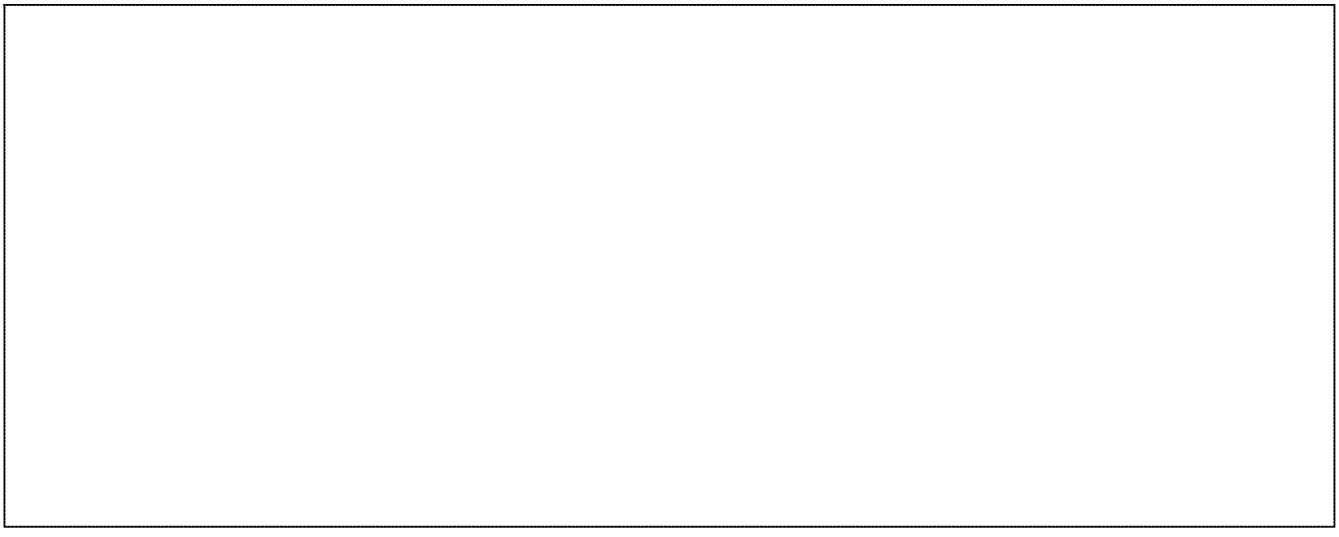
_____

_____

_____

PHOTOGRAPHS TAKEN?:_____

DIAGRAM:



INVESTIGATOR'S SIGNATURE:_____ DATE:_____

SUPERVISOR'S SIGNATURE:_____ DATE:_____

(01620/EXHIB1/P)

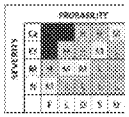
ATTACHMENT F

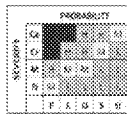
NOT USED

ATTACHMENT G

RISK REGISTER

Tonawanda Coke Site 108
Risk Register
2019





Activity	HOC Confirmation	Hazard Identification	At Risk	Pre-Risk Mgt Evaluation Matrix			Pre-Risk Mgt Treatment	Risk Management & Control -- Safety & Health		Risk Management & Control -- Environmental			Responsible Person	Cost Contingency	Post-Risk Mgt Evaluation Matrix			Residual Risk Action	PM or Office Manager Approval	Post-Risk Mgt Treatment (Residual Risk)
				Probability	Severity	RAC (Pre-Risk)		Engineering/ Administrative Controls	PPE	Waste Management	Engineering/ Administrative Controls	Site Condition Controls			Probability	Severity	RAC (Post-Risk)			
General Field Work	Yes	Injuries, Cold Stress Injuries, Biological Hazards,	Site personnel	Likely	Critical	HIGH	Reduce	Activity Hazard Analysis, Procedures	Personal Flotation Device, Leather Work Gloves	Avoidance	Procedures, Regulatory Requirements,	Spill Kit on Site	Field Team Leader	Covered in Budget	Seldom	Critical	MODERATE	NA		Accept
Fish Sampling	Yes	Dropping, Slips/Trips/Falls, Drowning, Cuts/Punctures/Bites/Muscle Strains/Blunt force injury, Carp Fence/Plant Enclosures	Site personnel	Likely	Marginal	MODERATE	Reduce	Activity Hazard Analysis, Procedures	Level D - Modified, Personal Flotation Device, Leather Work Gloves	Avoidance, Disposal	Permits, Procedures, Regulatory Requirements, Training/education, Checklists/audits, Instructions	Spill Kit on Site	Field Team Leader	Covered in Budget	Likely	Marginal	MODERATE	NA		Accept
Sediment and Water Sampling	Yes	Dropping, Slips/Trips/Falls, Drowning, Cuts/Scrapes, Strains, Preservative Burns	Site personnel	Occasional	Marginal	MODERATE	Reduce	Activity Hazard Analysis, Procedures	Level D - Modified, Personal Flotation Device, Work Gloves	Avoidance, Disposal	Permits, Procedures, Regulatory Requirements, Training/education, Checklists/audits, Instructions	Spill Kit on Site	Field Team Leader	Covered in Budget	Seldom	Marginal	LOW	NA		Accept

ATTACHMENT H

LEGAL COMPLIANCE REGISTER

Attachment H
Tonawanda Coke Legal Compliance Registry
Content Revision Date: 4/6/2018

Item #	Description / identity of relevant SH&E risk	Identity / citation of related legal compliance obligation	How does one gain access to the text of this legal compliance obligation?	Remarks
1	General Safety & Health	• US OSHA 29 CFR 1926.20 • US ACE EM 385-1-1 01.A	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
2	Safety Training	• US OSHA 29 CFR 1926.21 • US ACE EM 385-1-1 01.B.01	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
3	First Aid and Medical	• US OSHA 29 CFR 1926.23 • US OSHA 29 CFR 1926.50 • US ACE EM 385-1-1 03.A	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
4	Fire Protection and Prevention	• US OSHA 29 CFR 1926.24 • US OSHA 29 CFR 1926.150-155 • US OSHA 29 CFR 1926.352 • US ACE EM 385-1-1 09.A	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
5	Housekeeping	• US OSHA 29 CFR 1926.25 • US ACE EM 385-1-1 14.C	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
6	Sanitation	• US OSHA 29 CFR 1926.27 • US OSHA 29 CFR 1926.51 • US ACE EM 385-1-1 02.A	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
7	Personal Protective Equipment	• US OSHA 29 CFR 1926.28 • US OSHA 29 CFR 1926.95-98 • US OSHA 29 CFR 1926.100-107 • US ACE EM 385-1-1 05.A	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
8	Emergency Employee Action Plans	• US OSHA 29 CFR 1926.35 • US ACE EM 385-1-1 01.E	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
9	Noise Exposure	• US OSHA 29 CFR 1910.95 • US OSHA 29 CFR 1926.52 • US ACE EM 385-1-1 05.C	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
10	Gases, Vapors, Dusts and Mists	• US OSHA 29 CFR 1926.55	• www.osha.gov	
11	Hazard Communication	• US OSHA 29 CFR 1926.59 • US ACE EM 385-1-1 1.B.06	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
12	Hazardous Waste Operations and Emergency Response	• US OSHA 29 CFR 1910.120 • US OSHA 29 CFR 1926.65 • US ACE EM 385-1-1 28.A	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
13	Accident prevention signs and tags	• US OSHA 29 CFR 1926.200 • US ACE EM 385-1-1 08.A	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
14	Signaling	• US OSHA 29 CFR 1926.201 • US ACE EM 385-1-1 08.B	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
15	Barricades	• US OSHA 29 CFR 1926.202	• www.osha.gov	
16	Material Storage	• US OSHA 29 CFR 1926.250 • US ACE EM 385-1-1 14.B	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
17	Waste Disposal	• US OSHA 29 CFR 1926.252 • US ACE EM 385-1-1 14.D	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
18	Tools	• US OSHA 29 CFR 1926.300-307	• www.osha.gov	

		• US ACE EM 385-1-1 13.A	• www.usace.army.mil/SafetyandOccupationalHealth.aspx	
19	Motor Vehicles, Mechanized Equipment	• US OSHA 29 CFR 1926.600-603 • US ACE EM 385-1-1 18.A	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
20	Site Clearing	• US OSHA 29 CFR 1926.604 • US ACE EM 385-1-1 31.A	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
21	Excavations	• US OSHA 29 CFR 1926.650-652 • US ACE EM 385-1-1 25.A	• www.osha.gov • www.usace.army.mil/SafetyandOccupationalHealth.aspx	
22	Internal Traffic Control	• US ACE EM 385-1-1 8.D	• www.usace.army.mil/SafetyandOccupationalHealth.aspx	
23	Traffic Movement Restriction Times	• US ACE EM 385-1-1 8.C	• www.usace.army.mil/SafetyandOccupationalHealth.aspx	
25	Boating	• OSH Act of 1970 SEC. 5. Duties	• www.osha.gov	

ATTACHMENT I

TRAINING MATRIX

Employee Name / Employee Title / Employee Function	Required Compliance / Risk Control / Risk Management Training	Required Licenses / Designations of Authority / Competencies / Qualifications / Certifications	Frequency of Required Refresher Training / Assessment of Continuing Competency
Field Team Leaders/Construction Manager	Basic orientation	ESHARP/PSHEP	On initial assignment, reviewed annually
	First Aid / CPR / AED	Designated provider of first aid / CPR provider	Every 2 years (with bloodborne pathogens training)
	PPE: Hardhats, Gloves, Eye Protection, Safety Boots	ESHARP/PSHEP	On initial assignment; upon changes to PPE use
	Parsons Fleet Driver Training		Training is required when personnel are required to operate a Parsons Owned or Leased vehicle on public roadways
Field Technicians	Basic orientation	ESHARP/PSHEP	On initial assignment, reviewed annually
	PPE: Hardhats, Gloves, Eye Protection, Safety Boots	ESHARP/PSHEP	On initial assignment; upon changes to PPE use
	Parsons Fleet Driver Training		Training is required when personnel are required to operate a Parsons Owned or Leased vehicle on public roadways

Current Training Certificates Database: P:\H&S_18\Training Certificates